

**Northside Specific Plan**  
**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
<i>Individuals</i>		
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



**From:** Rull, Paul <PRull@RIVCO.ORG>  
**Sent:** Monday, April 13, 2020 8:03 AM  
**To:** Eastman, 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

A1-1



**Confidentiality Disclaimer**

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[County of Riverside California](#)



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Blvd., Suite C-220  
Ontario, CA 91764  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



May 26, 2020  
Sent via email

Jay Eastman  
Principal Planner  
City of Riverside  
3900 Main Street, 3<sup>rd</sup> 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 the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

A2-1

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.

A2-2

#### 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, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, 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

A2-3

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

↑ A2-3  
↑ Cont.

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 lake 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.

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#### PROJECT DESCRIPTION SUMMARY

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 1,600 acres are within the City of Riverside, approximately 336 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.

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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.

#### COMMENTS AND RECOMMENDATIONS

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.

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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.

#### Special-status Plant Species

Mitigation Measure (MM) BIO-1a states that special-status plants impacted will be transplanted and preserved. Please note that CDFW does not recommend transplantation of established native plants given the low survival rate of transplants. As

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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.

A2-7  
Cont.

CDFW recommends that the City revise MM BIO-1a and condition the measure to include the following (edits are in **bold** and ~~strike through~~):

MM BIO-1a: Prior to **ground disturbing activities** ~~issuance of a grading permit~~ involving undeveloped lands in the Northside Specific Plan area (SPA) outside of the MSHCP, **botanical field surveys according to 2018 Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities** ~~a habitat assessment for the potential for special-status 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 blooming 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.**

A2-8

For special-status plants, if ~~100~~ **99%** 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 cases where more than 10% of the areas with long-term conservation value would be impacted, occurrences shall be transplanted and preserved. Prior to transplantation, a mitigation and monitoring plan shall be submitted the City of Colton for review by a qualified biologist and approval 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 at a minimum 3 4:1 ratio (occupied acres mitigated restored/enhanced to occupied acres impacted).~~ **Preservation 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.**

A2-9

~~The mitigation and monitoring plan for the transplanted special-status plant(s) will describe habitat improvement/restoration measures to be completed prior to introducing transplanted special-status plants. Habitat improvement/restoration will be based on special-status plant occupied habitat. The plan will specify: (1) the location of mitigation site(s); (2) site preparation measures such as topsoil treatment, soil decompaction, erosion control, temporary irrigation systems, or other measures as appropriate; (3) the source of all plant propagules (seed, potted nursery stock, etc.), the quantity and species of seed or potted stock of all plants to be introduced or planted into the restoration/enhancement areas; (4) a schedule and action plan to maintain and monitor the enhancement/restoration areas, to include at minimum, qualitative annual monitoring for revegetation success and site degradation due to erosion, trespass, or animal damage for a period no less than 2 years; (5) measures to avoid long-term indirect effects; and (5) contingency measures such as replanting, weed control, or erosion control to be implemented if habitat improvement/restoration efforts are not successful. In addition, the plan will specify methods to collect special-status plants and introduce them into the mitigation site.~~

A2-10

#### 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, nor 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 ~~strike through~~):

A2-11

MM-BIO-5a: ~~Prior to issuance of grading permits~~ **ground disturbing activities** for Northside Specific Plan areas outside of the MSHCP on undeveloped lands, a ~~habitat assessment for San Bernardino kangaroo rat or Stephens' 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.**

A2-12

**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 CDFW 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 Stephen's kangaroo rat is present on the site, a focused survey and trapping would be required ~~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 MSHCP 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 MSHCP website: <http://wrc-rca.org/about-rca/monitoring/monitoring-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 MSHCP, the following measures shall be noted on the grading plan prior to grading permit issuance and required to be implemented by the applicant.**

A2-13

~~Based on the Qualified Biologist assessment and surveys for San Bernardino kangaroo rat and/or Los Angeles pocket mouse, 90% of those portions of the site that provide for long-term conservation value for the species shall be avoided. If 90% of the portion of the site that provides long-term conservation value for San Bernardino kangaroo rat or Stephens' kangaroo 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 in suitable habitat, a qualified biologist shall conduct a survey 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 small mammal 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~~

A2-14



~~rat are present on the site, a take permit from the USFWS and CDFW will be required as described in Northside Specific Plan Program Environmental Impact Report CM-BIO-1, and measures may be refined with further input from these agencies~~

↑ A2-14  
Cont.

Burrowing Owl (*Athene cunicularia*)

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.

A2-15

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.

A2-16

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 (Trulio 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.

A2-17

CDFW offers the following revisions to MM BIO-8a (edits are in ~~strike through~~ and **bold**):

MM-BIO-8a: Prior to ~~issuance of a grading permit~~ **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

A2-18  
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~~demonstrate that burrowing owl is absent~~, 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 ~~noted on the grading plan completed~~ prior to ~~grading permit issuance~~ **ground disturbing activities** and ~~required to be implemented by the applicant in suitable burrowing owl habitat outside of the MSHCP.:~~

A2-18  
Cont.

- 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 (CDFG 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 work occurs no closer than 50 meters (165 feet) from the burrow. Depending on the level of disturbance, A 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 scoping, a qualified~~

A2-19

A2-20

~~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/approval prior to the commencement of disturbance activities on-site.**

A2-20  
Cont.

- 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.**

A2-21

#### 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/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto: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>.

A2-22

Jay Eastman, Principal Planner  
City of Riverside  
Northside Specific Plan Project, State Clearinghouse No. 2019039168  
May 26, 2020  
Page 9 of 10

## FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

A2-23

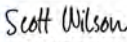
## CONCLUSION

CDFW recommends that the City include in the Final EIR the recommended revised mitigation measures offered by CDFW to reduce project impacts.

CDFW appreciates the opportunity to comment on the DEIR for the Northside Specific Plan Project (SCH No. 2019039168) and hopes our comments assist the City of Riverside in identifying and mitigating Project impacts on biological resources. If you should have any questions pertaining to the comments provided in this letter, please contact Cindy Castaneda, Environmental Scientist, at 909-484-3979 or at [cindy.castaneda@wildlife.ca.gov](mailto:cindy.castaneda@wildlife.ca.gov).

A2-24

Sincerely,

DocuSigned by:  
  
8091B1A9242F49C...

Scott Wilson  
Environmental Program Manager

ec: Cindy Castaneda, Environmental Scientist  
Inland Deserts Region  
[Cindy.Castaneda@wildlife.ca.gov](mailto:Cindy.Castaneda@wildlife.ca.gov)

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Jay Eastman, Principal Planner  
City of Riverside  
Northside Specific Plan Project, State Clearinghouse No. 2019039168  
May 26, 2020  
Page 10 of 10

## **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/nongame/survey\\_monitor.html](http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html)
- Trulio, L.A. 1995. Passive Relocation: A Method to Preserve Burrowing Owls on Disturbed Sites. *Journal of Field Ornithology* 66:99-106.



May 21, 2020

City of Riverside  
 Community & Economic Development Department  
 Planning Division  
 3900 Main St., 3<sup>rd</sup> Floor  
 Riverside, CA 92522  
 ATTN: Jay Eastman, Principal Planner

SUBJECT: Draft Northside Neighborhood & Pellissier Ranch Specific Plan and  
 Draft EIR

Dear Mr. Eastman:

The City of Colton is pleased to review the most recent Draft Northside Specific Plan and the Draft EIR. As a responsible agency for this project, with approximately 323 acres of the project area located within the City of Colton (including approximately 227 acres owned by Riverside Public Utilities), the City of Colton continues to be actively engaged in this planning process. As you know, any proposed and uses, circulation changes or other modifications within the City of Colton will require the adoption of general plan amendments and zone changes to incorporate those components of the new Specific Plan that are supported by this City.

A3-1

**Draft Northside Neighborhood & Pellissier Ranch Specific Plan  
 (March 26, 2020)**

**Vision, Principles & Key Plan Elements**

Section 2.4.5 - Pellissier Ranch Redevelopment: This narrative should discuss connectivity and land use relationships with the adjacent Roquet Ranch Specific Plan.

A3-2

Section 2.4.9 – Industrial Research Park (IRP): This narrative states that land uses “can include many of the same uses included in the Light Industrial designation, including fabrication, manufacturing, assembly, warehouse uses...” This statement is in conflict with the Permitted Land Uses table (page 34).

A3-3

Section 2.4.10 – Overlay Zones – Transition Zone Overlay (TZO): Regarding the statement that “in the City of Colton, the TZO allows for Light Industrial land 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.” Please clarify this statement, as it appears to conflict with the Permitted Land Uses table.

A3-4

#### Land Use & Regulatory Framework

Table 3.4 – Land Use & Zone Description Tables (City of Colton):

Transition Zone Overlay (page 31): The TZO needs to be better described, as the site development standards refer to “standards in the City of Colton Zoning Code.” The TZO applies only to the Riverside Public Utilities (RPU) property, which has Industrial Research Park and High Density Residential zones. These zones do not exist in the City of Colton Zoning Code. Is this narrative referring to the current City of Colton’s M-1 zone on the RPU property?

A3-5

In addition, the Draft EIR references that the TZO allows up to 4.0 million sq. ft. of Light Industrial uses “within up to 50,000 sq. ft. buildings” (DEIR, pg. 2-16). However, this standard is not included in the Draft Specific Plan. Please clarify whether the City is proposing a maximum building size for this area.

A3-6

High Density Residential (HDR): Although this use is proposed only upon the RPU property (Pellissier Ranch), the City of Colton would not support a density of up to 60 units per acre in this area. We recommend a maximum density of 36 units per acre.

A3-7

Table 3.5 – Use Tables (pages 34-35):

Colton Residential Overlay (R-O): Permitted uses should not be listed for the R-O zone. This is inconsistent with the purpose of this overlay zone. The R-O is intended only to allow residential uses as an alternative to the base zoning. This column should simply refer to uses permitted by the City of Colton’s base zone.

A3-8

M-1 (Light Manufacturing) Zone: This column should refer only to the Colton Municipal Code (the City of Colton does not required a conditional use permit for custom or light manufacturing within the M-1 zone).

A3-9



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.

A3-10

#### 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).

A3-11

#### Circulation, Mobility, & Trails

Please refer to attached comments from the City of Colton's contract traffic engineer, Minagar & 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 Resources Code Section 4290, and adopted City of Colton Guidelines 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.

A3-12

Figure 4-4, Complete Streets Map (page 50): The proposed connection from Center St. to Placentia 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.

A3-13

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

A3-14



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.

A3-15

#### **Draft Northside Specific Plan Environmental Impact Report**

##### **Project Description, Chapter 2**

Please confirm that the following statistics contained in the Project Description are accurate:

- 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 1,620 dwelling units may be developed on the RPU property in Colton (assuming densities of 29-45 du/ac).

A3-16

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. As such, two scenarios are considered; one with Orange St. connected north to the City of Colton and one with Orange St. terminating at the Trujillo 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.

A3-17

##### **Table 2-6 – Compliance Measures:**

- 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.

A3-18

A3-19

##### **Aesthetics, Chapter 3.1**

Subarea 1 & 2 Impact Analysis, page 3.1-15: As requested by the City of Colton in our NOP comment letter, the visual and light & glare impacts on the approved

A3-20

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.

A3-21

Air Quality, Chapter 3.2

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).

A3-22

Biological Resources, Chapter 3.3

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.

A3-23

Impact Analysis, Jurisdictional Waters, 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.

A3-24

Hazards & Hazardous Materials, Chapter 3.8

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.

A3-25

Hydrology & Water Quality, Chapter 3.9

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.

A3-26

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 2,961 to 4,606 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 operable 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, Minagar & Associates, and are attached hereto. We wish to emphasize two very pertinent issues:

A3-34

-

- 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 system. 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.

A3-35

A3-36

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.

A3-37

Solid Waste – City of Colton, page 3.17-19: The current solid waste service provider for the City of Colton is CR&R, Inc., not Republic Services.

A3-38

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. O-020-20).

A3-39

Wildfire, 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).

A3-40

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 amendment and rezoning applications to the City of Colton. 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

A3-41

C: Bill Smith, City Manager  
Robert DeLoach, Interim Public Works & Utilities Director  
Victor Ortiz, City Engineer  
Tim McHargue, Fire Chief  
Ray Bruno, Fire Marshall  
Art Morgan, Economic Development Manager



## MINAGAR & ASSOCIATES, INC.

Traffic Engineering – Transportation Planning – Intelligent Transportation Systems (ITS) – Civil/Electrical Engineering & CEM Consultants



May 18, 2020

Mr. Mark Tomich, AICP  
Director, Development Services Department  
City of Colton  
659 N. La Cadena Drive  
Colton, CA 92324

**Subject: TO#232 – 1<sup>st</sup> Review of Draft EIR Northside Specific Plan TIA, Dated March, 2020, Riverside CA**

Dear Mr. Tomich,

We have completed our 1<sup>st</sup> review of the **Draft EIR Northside Specific Plan TIA, dated March, 2020, Riverside CA**. Per your request, our focused our reviews on the following documents:

- A. Draft Northside Specific Plan**
- B. Chapter 3.15 from Draft EIR (Transportation)**
- C. Appendix H to Draft EIR (Traffic Analysis)**

Our comments are listed as follows:

**A. Draft Northside Specific Plan**

1. Page 47, Figure 4-1 Roadway Network Map – Why in the City of Colton the second north-side Secondary Arterial was eliminated? It was shown on the Administrative Draft.
2. Page 47, Figure 4-1 Roadway Network Map – Why Orange St. is proposed to be "cul-de-sac'd" at Center St. It should continue into Roquet Ranch.
3. Due to the potential negative ramification of COVID-19 on local CIPs, State STIP and Federal FTIP, all the potential funding sources should be revisited.-

**B. Chapter 3.15 from Draft EIR (Transportation)**

4. Has the proposed First Student School Bus Yard Sites (TIS) located at 111 Main Street and 2001 Key Street in Colton slated for completion in 2021 been included in the traffic analysis? The proposed project will have significant impacts at Main Street at Placentia Lane (their proposed mitigation is signalization) and Main Street at SR-60 EB Ramps (their proposed mitigation measure of restriping is subject to Caltrans D-8 approval).
5. Why does the DEIR future horizon year use 2040 while SCAG/SCS uses 2045?
6. On Page 3.15-3, there is no mention of the City of Colton's General Plan Mobility Element nor the City's LOS criteria and thresholds.
7. How come the two most important freeway feeders to the City of Colton's portion of the project, I-215 NB Northbound on- & off-ramps and Southbound on- & off-ramps at S. La Cadena were not included in the study?

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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 20240 Without Project to 111.4 seconds in PM Peak Hour during 2040 SP Scenario One. It should be noted that the same intersection 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 "cule-de-sac'd".
14. On Table 3.15-22, why does the delay time for the intersection #9 (shared jurisdiction Colton/Riverside), go down from over 200 seconds for Horizon Year 2040 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, 3.15-6, 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 Pellisier Road and Orange Street extension while on the Administrative Draft document in addition to the proposed Pellisier 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/reviewer.
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 Cadena 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#9) 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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at La Cadena Dr. Since the majority of the distribution centers/warehousing 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 projected 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 to be cul-de-saced at Center St. but rather to continue into Roquet Ranch and ultimately to connect all the way to S. Riverside St.

A3-63

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 Pellisier 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./Pellisier Rd (two unsignalized intersections). Under the Future 2040 Without Project, the following intersections in the City of Colton will operate all 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 Pellisier Rd.

A3-64

### **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 (M-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 21,540 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 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 not only for future north-south arterials and feeders for the project and the area but also connectors to I-215 Freeway NB & SB On- & Off-ramps and S. La Cadena Ave. in the City of Colton.
25. Does 2040 RIVTAM 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 19, the 3<sup>rd</sup> highest traffic volumes of 26,945 for the Horizon Year 2040 Baseline Without Project occurs on the segment north of the intersection of

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- Main St./Center St, on Riverside Ave. solidifying the need for supplemental north-south arterials/feeders.
27. On Exhibit 10, the same comment as number 20.
28. On Table 18, why is the delay for the intersection #9 is decreased from over 200 seconds for 2040 Without Project to 114.4 for 2040 SP Scenario One during the PM peak Hour?
29. On Table 20, why is the delay for the intersection #9 is decreased from over 200 seconds for 2040 Without Project to 112.7 for 2040 SP Scenario One With Orange Street Extension during the PM peak Hour?
30. On Table 24, why is the delay for the intersection #9 is decreased from over 200 seconds for 2040 Without Project to 112.2 for 2040 SP Scenario One With Orange Street Extension during the PM peak Hour?
31. Has the proposed First Student School Bus Yard Sites (TIS) located at 111 Main Street and 2001 Key Street in Colton slated for completion in 2021 been included in the traffic analysis? The proposed project will have significant impacts at Main Street at Placentia Lane (their proposed mitigation is signalization)? The Mitigation Measure 7 for the Intersection #9 on Page 104 and Exhibit 27B on Page 108 to be revisited.
32. On Page 115, Mitigation Measure #26, the same comment as #31 above.
33. On Exhibit 29 B, for Intersection #9, the same comment as #31.
34. On Exhibit 30, the same comment as #20.
35. On Table 30, delay time for 2040+ Project cannot be less than 2040 Without Project for the Intersection #9 during the PM Peak Hour.
36. On Page 129, Other Transportation Recommendations, Heavy Vehicle Route Signage, while the emphasis is on heavy vehicle restriction on Main Street South of Center Street in the City of Riverside, there are no recommendations for improving Riverside Ave to the north which serves Agua Mansa Industrial Corridor!
37. On Table 37, Fair Share & the corresponding cost allocation for Intersection #22, why is the cost estimate from SBC CMP 2003, 17 years ago?
38. On Table 38, Fair Share & the corresponding cost allocation for Street Segment #23, why is the cost estimate from SBC CMP 2003, 17 years ago?
39. References on Page 141 indicate using Synchro 10.0 micro computer software while a review of the Synchro computer printouts document using Synchro 9.0 for some target years and Synchro 10.0 for some others!
40. Appendix G, the Cumulative Projects Lists and Maps, a review of the 21 cumulative projects for the City of Colton show that it does not include a number of warehousing, industrial and others subsequent to the preparation of Roquet Ranch FEIR during the past couple of years!

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Should you have any questions, I can be contacted conveniently via e-mail  
[minagarf@minagrinc.com](mailto:minagarf@minagrinc.com).

Thank you.

Sincerely,

**MINAGAR & ASSOCIATES, INC.**  
(A California Corporation)

Fred Minagar, MS, RCE, PE, FITE  
President/Contract City Traffic Engineer

A3-86

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

Good afternoon Jay,  
 I hope you, your family and team at the City are doing well during this time. As I am sure you know, the entire community grieves the loss of our dear friend Bob Stockton, 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.

A4-1

Rick Engineering was the lead consultant for the planning effort of the Northside Specific Plan the Chamber, and the Chamber's Hunter Park Business Council Board has been actively involved in this for years. From our first formal letter in 2015, 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 discussion. Many of our Hunter Park Business Council Board members attended the workshops and meetings to engage on behalf of the business community regarding the significant undertaking of this size of a specific plan. So I commend 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 improve the Northside's vitality and future growth. Prior to the Planning Commission review of the Specific Plan and DREIR during public hearing, we will send a formal letter to the Planning Commission.

A4-2

The Chamber's Hunter Park Board is slated 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](mailto:bbiddle@riverside-chamber.com)

Phone: 951-683-7100 ext. 210

Cell: 714-747-0533

Fax: 951-683-2670

Stay updated 24/7:



"The Chamber...building a stronger local economy"



**From:** Flores, Francisco <FFlores@mwdh2o.com>  
**Sent:** Thursday, April 16, 2020 12:12 PM  
**To:** Eastman, Jay  
**Subject:** [External] Northside Specific Plan  
**Attachments:** Letter and map.cleaned.pdf

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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).

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Hello Jay,

Metropolitan Water District of Southern California does not have any facilities within the limits of your project area. If you have any questions, please feel free to contact me.

Thank you

*Francisco Flores, P.E.  
Senior Engineer  
Metropolitan Water District  
Substructures Team  
213.217.6679*

A5-1





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RIVERSIDE

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**Community & Economic Development Department**

**Planning Division**

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | [RiversideCA.gov](http://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 14 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 (P19-0063, P19-0064, P19-0065, P19-0066)

**PROJECT LOCATION:** The approximately 2,000-acre Northside Specific Plan Area (SPA) is located on the border between the County of San Bernardino and County of Riverside within the Southern California region (Figure 1). The SPA straddles the boundary between these two counties, as well as local jurisdictions. As a result, 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 unincorporated County of Riverside. Within the City of Colton area of the SPA, 227 acres (the Pellissier Ranch area) is owned by Riverside Public Utilities (RPU). Locally, the SPA is southwest of La Loma Hills, 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-minute series Fontana, 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 document includes an introduction, planning context, planning framework, land use, mobility, and implementation strategies. The Northside Specific Plan is intended to provide guidance for future development of 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 (MHDR), High-Density Residential (HDR), Commercial (C), General Commercial (C-2), Business/Office Park (B/OP), Freeway Mixed-Use (West La Cadena Drive Corridor) (FMU), Mixed-Use Neighborhood (MU), Northside Village Center (NVC), Open Space, Parks, and Trails (OS), Public Facilities/Institutional (PF), Trujillo Adobe Heritage Village (TAHV), Outdoor Commercial Recreation (OCR), Light Industrial (M-1), and Industrial Research Park (IRP). A Residential Overlay (R-O) Zone is proposed to allow additional residential uses in

some areas. In addition, the project includes a Transition Zone Overlay (TZO) to allow for continued implementation of the existing zoning until markets allow for the transition to the uses proposed. Based on the typical expectation that future development would be built out to 75% of the maximum allowed density, the project would allow for the buildout between 11,260 and 13,112 residential units and 16,559,700 square-feet of employment-based uses within the Northside Community.

Implementation of the proposed project will require the following discretionary approvals from the City of Riverside: Adoption of a Change of Zone (P19-0063), Adoption of a General Plan Amendment (P19-0064), Adoption of the Northside Specific Plan (P19-0065), and Certification of the EIR (P19-0066). The project would also require approvals from the City of Colton, 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 would result in significant impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous 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 25, 2020. A copy of the Draft EIR and associated documents are available for public review on the following websites: <https://riversideca.gov/planning/> and [www.northsideplan.com](http://www.northsideplan.com).

Due to current Covid-19 guidance from the California Department 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, 3900 Main Street, Third Floor, Riverside, CA 92522; (2) the Riverside Main Public Library, 3581 Mission Inn Avenue, Riverside, CA 92501; (3) Riverside Public Library, Arlington Branch, 9556 Magnolia Avenue, Riverside, CA 92503. Questions related to Draft EIR availability should be directed to the project contact. Responses to this Draft EIR must be sent to Jay Eastman, Principal Planner, in writing no later than Monday, May 25, 2020, by e-mail or post at the following address:

**LEAD AGENCY:**

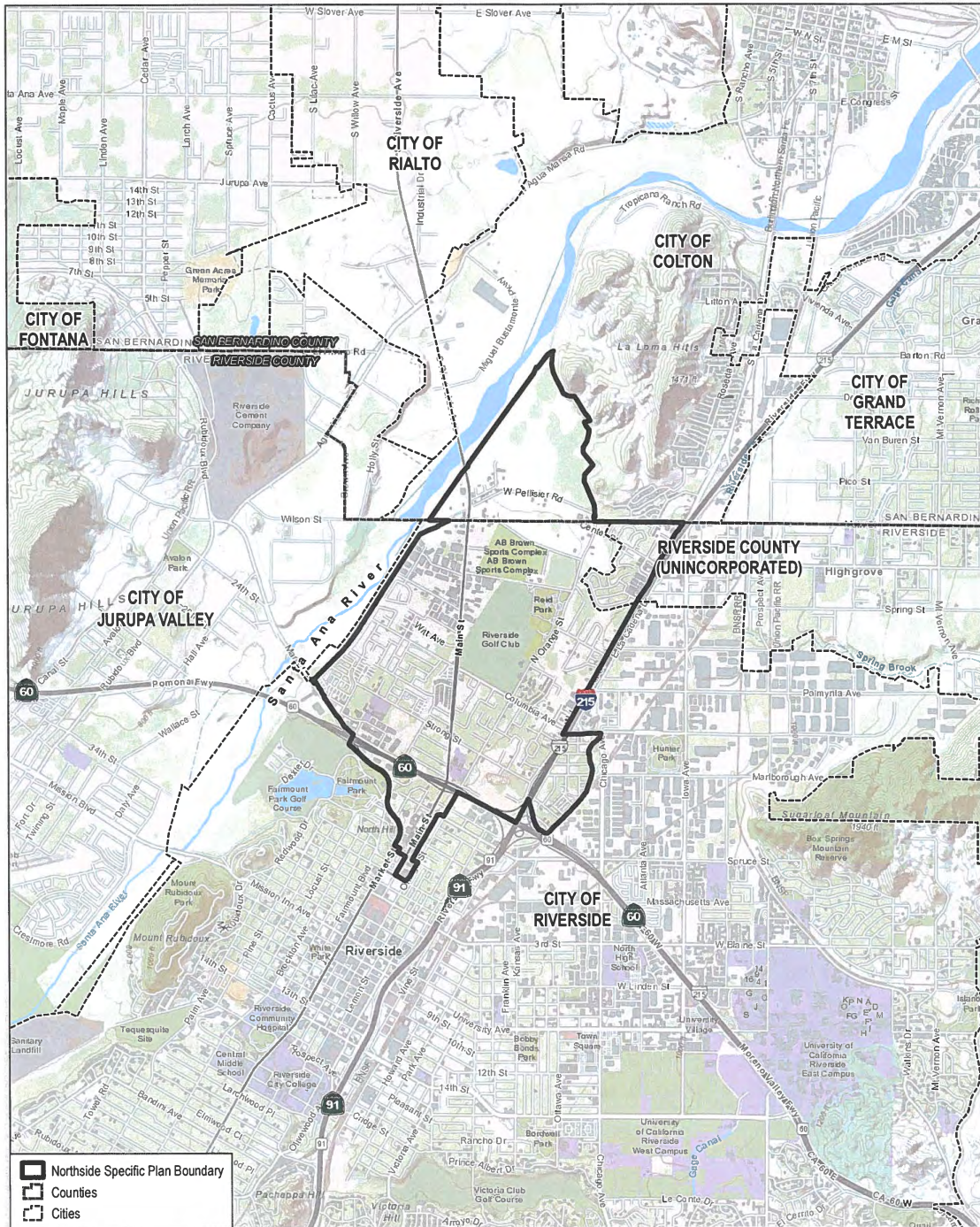
City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main Street, 3rd Floor  
Riverside, California 92522  
Attn: Jay Eastman, Principal Planner  
(951)826-5264  
[JEastman@riversideca.gov](mailto:JEastman@riversideca.gov)

**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.

**HAZARDOUS MATERIALS STATEMENT:** There are two sites within the Specific Plan Area that are on the Cortese List pursuant to Government Code Section 65962.5; Alark Hard Chrome (2775 Main Street) and Snyder Trust Property (2511 Northbend Street). It is also noted that an approximately 2.3 miles of an 11.11-mile-long petroleum 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 consistency with the Riverside Municipal Airport Land Use Compatibility Plan. In addition, Tribal Consultations have been conducted, and in some circumstances are ongoing.





SOURCE: City of Riverside 2020; Riverside County 2020; San Bernardino County 2020; ESRI Basemap

FIGURE 1

Project Location  
Northside Specific Plan



JASON E. UHLEY  
General Manager-Chief Engineer



1995 MARKET STREET  
RIVERSIDE, CA 92501  
951.955.1200  
FAX 951.788.9965  
www.rcflood.org  
230526

RIVERSIDE COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

April 8, 2020

City of Riverside  
Planning Department  
3900 Main Street  
Riverside, CA 92522

Attention: Jay Eastman

Re: Northside Specific Plan  
P19-0063, 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 Real 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 Lines 8C, 8E, 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

City of Riverside  
 Re: Northside Specific Plan  
 P19-0063, 19-0064, 19-0065, 19-0066

-2-

April 8, 2020

- ☐ This project is located within the limits of the District's \_\_\_\_\_ Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid by cashier's check or money order only to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.
- ☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, University Wash Channel. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- ☒ The District's previous comments are still valid. (See attached letter for P19-0065)

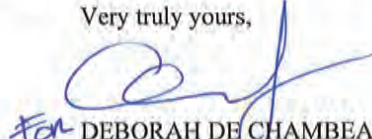
#### **GENERAL INFORMATION**

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

  
 For DEBORAH DE CHAMBEAU  
 Engineering Project Manager

Attachment

cc: Riverside County Planning Department  
 Attn: John Hildebrand

SLJ:rlp

A6-2  
 Cont.

A6-3

A6-4

A6-5

**From:** Kendra Reif <KReif@aqmd.gov>  
**Sent:** Tuesday, May 19, 2020 11:59 AM  
**To:** Eastman, Jay  
**Cc:** Lijin Sun; Celia Diamond  
**Subject:** [External] South Coast AQMD Staff's Comments on Draft Program Environmental Impact Report for the Northside Specific Plan  
**Attachments:** RVC200403-01 DEIR Northside Specific Plan\_20200519.cleaned.pdf

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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).

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Dear Mr. Eastman,

Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report (Draft EIR) for the Proposed Northside Specific Plan (SCH No.: 2019039168) (South Coast AQMD Control Number: RVC200403-01). Please contact me if you have any questions regarding these comments.

Kind regards,

*Kendra Reif*  
Air Quality Specialist, CEQA IGR  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765  
(e) [kreif@aqmd.gov](mailto:kreif@aqmd.gov)

\*Please note that the building is closed to the public and I am working remotely. I will be responding to emails and voice messages during my scheduled work hours, Tuesday through Friday 7:00 am to 5:30 pm. Thank you.

A7-1





# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL:

[JEastman@RiversideCA.gov](mailto:JEastman@RiversideCA.gov)

Jay Eastman, Principal Planner  
City of Riverside, Planning Department  
3900 Main Street, Third Floor  
Riverside, CA 92522

May 19, 2020

## **Draft Program Environmental Impact Report (EIR) for the Northside Specific Plan (SCH No. 2019039168)**

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 Riverside, 336 acres in the City of Colton, and 83 acres in the unincorporated areas of County of Riverside. Interstate 215 (I-215) runs north-south along the majority of the Proposed Project area. State Route 60 (SR-60) 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<sup>1</sup>.

A7-2

### 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 years<sup>2</sup> 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)<sub>10</sub>, and PM<sub>2.5</sub> at 1,583.49 pounds per day (lbs/day), 1,174.37 lbs/day, 998.31 lbs/day, 216.61 lbs/day, and 107.82 lbs/day, respectively<sup>3</sup>. 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, PM<sub>10</sub>, and PM<sub>2.5</sub> at 2,338.84 lbs/day, 247.31 lbs/day, 5,377.52 lbs/day, 801.16 lbs/day, and 754.67 lbs/day, respectively<sup>4</sup>.

A7-3

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

<sup>1</sup> Draft Program EIR. Table 2-3. Page. 2-9.

<sup>2</sup> *Ibid.* Page. 3.2-39.

<sup>3</sup> *Ibid.* Page. 3.2-50.

<sup>4</sup> *Ibid.* Page. 3.2-52.

standards. 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.

A7-3  
Cont.

#### 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.

A7-4

#### Conclusion

Pursuant to California Public Resources Code Section 21092.5(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(c)). 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).

A7-5

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 Kendra Reif, Air Quality Specialist, at [kreif@aqmd.gov](mailto:kreif@aqmd.gov), should you have any questions or would like to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:KR

RVC200403-01

Control Number

## ATTACHMENT

**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<sup>5</sup>, 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.

A7-6

**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:

a) For off-road equipment with engines rated at ~~75~~ 50 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.<sup>1</sup> (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<sup>6</sup>. To ensure 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 contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and California Air Resources Board (CARB) or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

A7-7

[...].

**2. Additional Recommended Air Quality Mitigation Measures**

CEQA requires that the Lead Agency considers 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

A7-8

<sup>5</sup> *Ibid.* Page 3.2-55.

<sup>6</sup> *Ibid.* Page ES-27.

Agency should take this opportunity to deploy and incentivize the use of the lowest emission technologies at the Proposed Project. To further reduce the Proposed Project's construction emissions that will occur over time, South Coast AQMD staff recommends that the Lead Agency require the use of electric or alternative-fueled construction equipment and cleaner trucks during construction in the Final Program EIR. The recommended new air quality mitigation measures in underline are provided as follows. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website<sup>7</sup>.

A7-8  
Cont.

*Construction-related Air Quality Mitigation Measures for Off-Road Vehicles*

Require construction equipment such as concrete/industrial saws, pumps, aerial lifts, material hoist, air compressors, forklifts, excavator, wheel loader, and soil compactors be electric or alternative-fueled (i.e., non-diesel). Information on companies and electric powered equipment that can and should be used during construction is available at: <https://www.forconstructionpros.com/construction-technology/article/21107531/electrified-construction-equipment-gaining-momentum>.

A7-9

*Construction-related Air Quality Mitigation Measure for On-Road Vehicles*

Require the use of zero-emissions (ZE) or near-zero emissions (NZE) on-road vehicles (e.g., material delivery trucks and soil import/export) during construction, such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, the Lead Agency may require that operators commit to using 2010 model year or newer engines that meet California Air Resources Board (CARB)'s 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks and equipment. To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's operation, and make these records available to the Lead Agency upon request. Alternatively, the Lead Agency should require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasible and practicable.

A7-10

NZE heavy-duty truck engines are commercially available. Examples of commercially available NZE heavy-duty truck engines that meet California Air Resources Board's optional low NOx standards include, but are not limited to, Cummins Westport 8.9- and 6.7-liter natural gas engines and Roush Cleantech 6.8- liter compressed natural gas and liquefied petroleum gas engines<sup>19</sup>. Therefore, NZE heavy-duty trucks should be required for use during construction (e.g., material delivery trucks and soil import/export).

A7-11

On March 3, 2017, the South Coast AQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)<sup>8</sup>, which was later approved by CARB on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin (Basin). The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

A7-12

<sup>7</sup> South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

<sup>8</sup> South Coast AQMD. March 3, 2017. 2016 Air Quality Management Plan. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.



Implementation of the Proposed Project contributes to Basin-wide NO<sub>x</sub> 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 NO<sub>x</sub> 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 commits to the use of cleaner trucks during construction (e.g., material delivery trucks and soil import/export).

A7-12  
Cont.

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.

A7-13

- 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(s)/truck operator(s) selection policy that prefers contractor(s)/truck operator(s) 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 process and criteria for periodically assessing progress in implementing the use of ZE heavy-duty trucks during construction.

A7-14

### 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<sup>9</sup>. Since the Proposed Project is a large operation of approximately 2,000 acres<sup>10</sup> (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 Operations<sup>11</sup>. Additional requirements may include, but are not limited to, Large Operation 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 class<sup>12</sup>. 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.

A7-15

<sup>9</sup> *Ibid.* Page 3.2-59.

<sup>10</sup> *Ibid.* Page ES-2.

<sup>11</sup> South Coast AQMD. Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>12</sup> South Coast AQMD Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at [dustcontrol@aqmd.gov](mailto:dustcontrol@aqmd.gov).

Craig D. Miller  
General Manager

Robert Stockton  
Division 1

Gracie Torres  
Division 2

Brenda Dennstedt  
Division 3

Donald D. Galleano  
Division 4

S.R. "Al" Lopez  
Division 5



March 27, 2020

Jay Eastman  
Principal Planner  
City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522

**NOTICE OF AVAILABILITY AND NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT FOR NORTHSIDE SPECIFIC PLAN**

This letter is in response to the Draft Environmental Impact notice transmittal to Western Municipal Water District (Western) received March 23, 2020.

Western has no comments on the proposed Northside Specific Plan.

Our records indicate portions of the Northside Specific Plan are within Western's boundary. The specific plan boundary is outside of Western's Retail Service Area. Western does not provide retail water, sanitary sewer, or recycled water services within the boundary of northside Riverside, downtown Riverside, Hunter Industrial Park, or within the residential area west of the I-215 and north of Center Street. Our records indicate that the City of Riverside and West Valley Water District are the water and/or sewer purveyor within this specific plan area.

Should you have any questions regarding this matter, please contact Development Services at (951) 571-7100 or by email at [development@wmwd.com](mailto:development@wmwd.com).

*Tom Scott*

THOMAS G. SCOTT  
Principal Engineer

TGS:dsc:sc

Enclosure(s):

1. Initial Case Transmittal
2. Western Map

A8-1

A8-2



CITY OF  
RIVERSIDE

RECEIVED

MAR 23 2020

WMWD/Engineering

2

Community & Economic Development Department

Planning Division

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | 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 14 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 (P19-0063, P19-0064, P19-0065, P19-0066)

**PROJECT LOCATION:** The approximately 2,000-acre Northside Specific Plan Area (SPA) is located on the border between the County of San Bernardino and County of Riverside within the Southern California region (Figure 1). The SPA straddles the boundary between these two counties, as well as local jurisdictions. As a result, 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 unincorporated County of Riverside. Within the City of Colton area of the SPA, 227 acres (the Pellissier Ranch area) is owned by Riverside Public Utilities (RPU). Locally, the SPA is southwest of La Loma Hills, 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-minute series Fontana, 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 document includes an introduction, planning context, planning framework, land use, mobility, and implementation strategies. The Northside Specific Plan is intended to provide guidance for future development of 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 (MHDR), High-Density Residential (HDR), Commercial (C), General Commercial (C-2), Business/Office Park (B/OP), Freeway Mixed-Use (West La Cadena Drive Corridor) (FMU), Mixed-Use Neighborhood (MU), Northside Village Center (NVC), Open Space, Parks, and Trails (OS), Public Facilities/Institutional (PF), Trujillo Adobe Heritage Village (TAHV), Outdoor Commercial Recreation (OCR), Light Industrial (M-1), and Industrial Research Park (IRP). A Residential Overlay (R-O) Zone is proposed to allow additional residential uses in

some areas. In addition, the project includes a Transition Zone Overlay (TZO) to allow for continued implementation of the existing zoning until markets allow for the transition to the uses proposed. Based on the typical expectation that future development would be built out to 75% of the maximum allowed density, the project would allow for the buildout between 11,260 and 13,112 residential units and 16,559,700 square-feet of employment-based uses within the Northside Community.

Implementation of the proposed project will require the following discretionary approvals from the City of Riverside: Adoption of a Change of Zone (P19-0063), Adoption of a General Plan Amendment (P19-0064), Adoption of the Northside Specific Plan (P19-0065), and Certification of the EIR (P19-0066). The project would also require approvals from the City of Colton, 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 would result in significant impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous 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 25, 2020. A copy of the Draft EIR and associated documents are available for public review on the following websites: <https://riversideca.gov/planning/> and [www.northsideplan.com](http://www.northsideplan.com).

Due to current Covid-19 guidance from the California Department 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, 3900 Main Street, Third Floor, Riverside, CA 92522; (2) the Riverside Main Public Library, 3581 Mission Inn Avenue, Riverside, CA 92501; (3) Riverside Public Library, Arlington Branch, 9556 Magnolia Avenue, Riverside, CA 92503. Questions related to Draft EIR availability should be directed to the project contact. Responses to this Draft EIR must be sent to Jay Eastman, Principal Planner, in writing no later than Monday, May 25, 2020, by e-mail or post at the following address:

**LEAD AGENCY:**

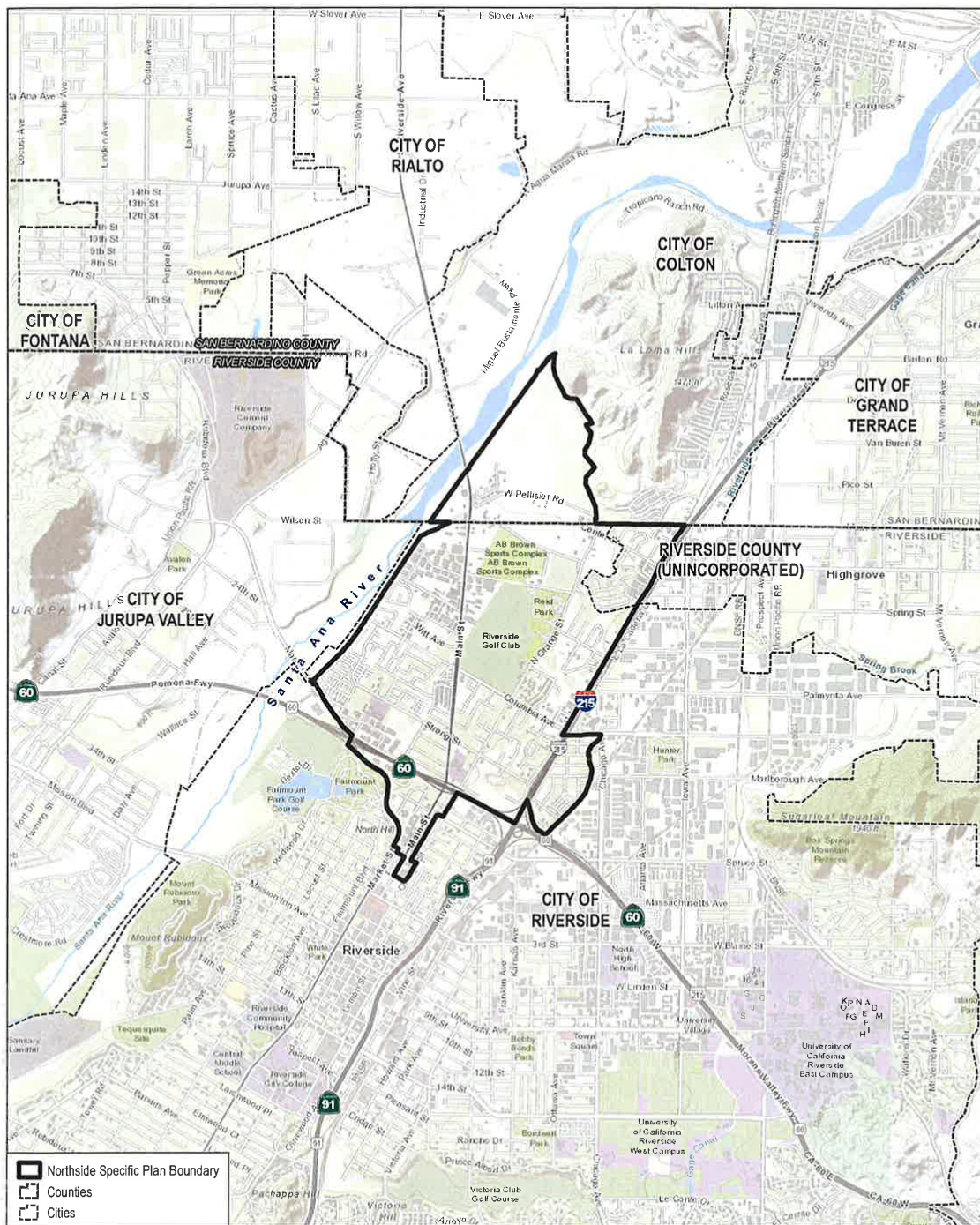
City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main Street, 3rd Floor  
Riverside, California 92522  
Attn: Jay Eastman, Principal Planner  
(951)826-5264  
[JEastman@riversideca.gov](mailto:JEastman@riversideca.gov)

**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.

**HAZARDOUS MATERIALS STATEMENT:** There are two sites within the Specific Plan Area that are on the Cortese List pursuant to Government Code Section 65962.5; Alark Hard Chrome (2775 Main Street) and Snyder Trust Property (2511 Northbend Street). It is also noted that an approximately 2.3 miles of an 11.11-mile-long petroleum 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 consistency with the Riverside Municipal Airport Land Use Compatibility Plan. In addition, Tribal Consultations have been conducted, and in some circumstances are ongoing.





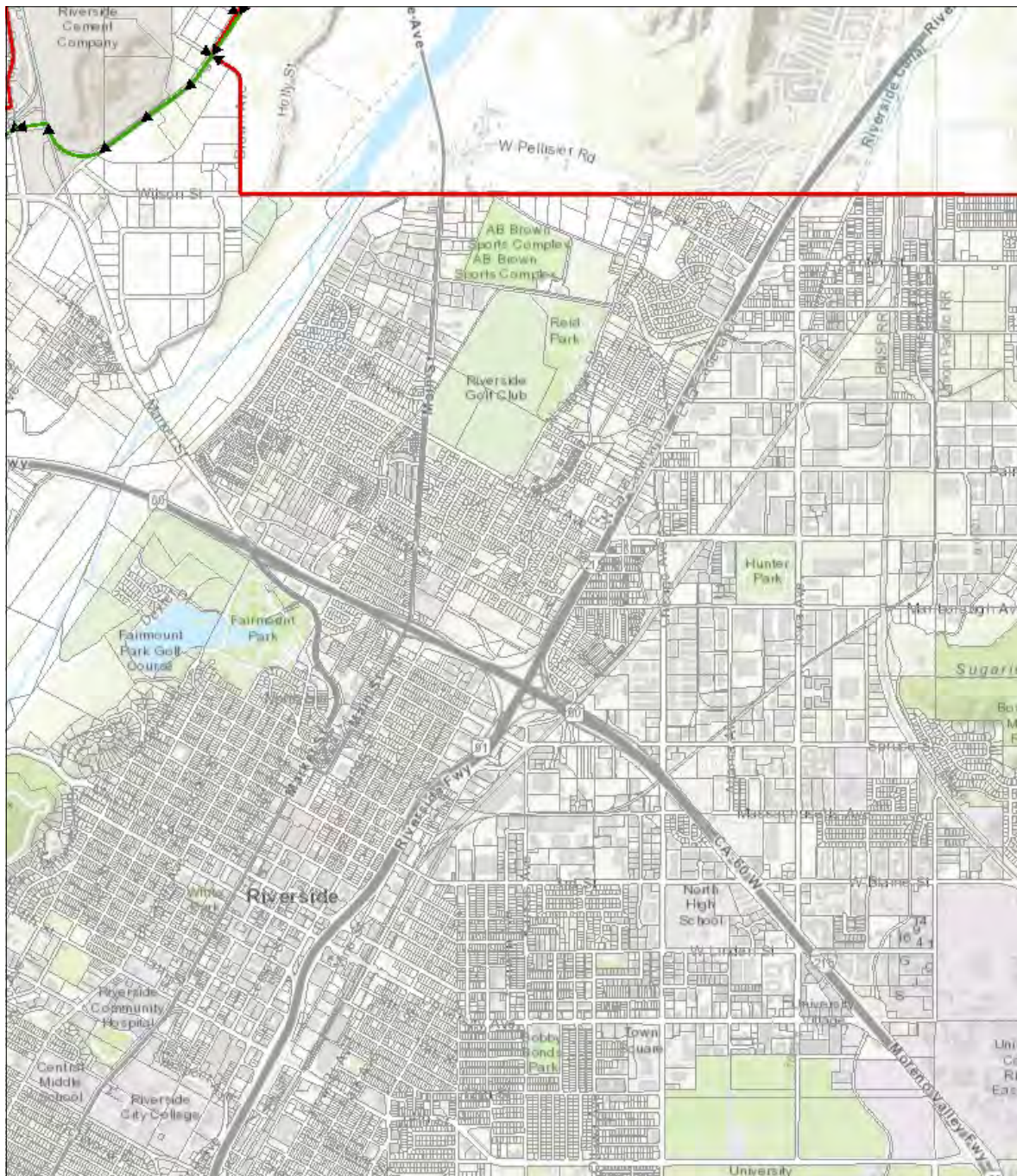
SOURCE: City of Riverside 2020; Riverside County 2020; San Bernardino County 2020; ESRI Basemap

**DUDEK** 0 0.5 1 Miles

**FIGURE 1**  
Project Location  
Northside Specific Plan



## WMWD - Northside Specific Plan



1: 36,112



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

Office of the General Manager

RECEIVED

MAY 26 2020

Community & Economic  
Development Department

May 20, 2020

VIA EMAIL AND USPS

Mr. Jay Eastman  
City of Riverside  
Community and Economic Development Department  
Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522

Dear Mr. Eastman:

Notice of Availability and Notice of Completion  
of a Draft Environmental Impact Report for the Northside Specific Plan Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Availability (NOA) and Notice of Completion of a Draft Environmental Impact Report (Draft EIR) for the Northside Specific Plan (Project). The City of Riverside is acting as the Lead Agency under the California Environmental Quality Act (CEQA) for the project. The project proposes to develop approximately 2,000 acres for residential, light retail, industrial uses, open spaces and parks, transportation corridors, utility improvements, and other infrastructure. The project also requires discretionary approvals for zone changes, general plan amendments, and other approvals. This letter contains Metropolitan's comments on the Project and the NOA as a potentially affected public agency.

A9-1

Metropolitan reviewed the project description of the proposed project to determine the proximity of its facilities within the project area. We determine the proposed project is partially within Metropolitan's service area. The proposed project site south of the San Bernardino/Riverside county line is within Metropolitan's member agency, Western Municipal Water District (Western MWD), boundaries; refer to the attached project figure. The area north of the county line is not currently within Metropolitan's service area and will need to be annexed prior to water being served. If the parcels ever develops and is to receive imported water it needs to annex to Metropolitan and Western MWD. Metropolitan is a responsible agency with respect to annexation and needs to be listed in the agency approval list related to EIR actions.

A9-2

The Draft EIR needs to include in the project description a brief statement on the proposed annexation to Metropolitan, Western MWD, and San Bernardino LAFCO, including water standby charges and other required conditions for annexation. Then, in the appropriate impact section (e.g., water supplies or utilities), there needs to be an analysis of this proposed annexation so that Metropolitan and others can rely on the EIR for their own discretionary

A9-3



Mr. Jay Eastman  
Page 2  
May 20, 2020

actions. We encourage the City to work with Metropolitan, Western MWD, and San Bernardino LAFCO on annexation procedures by contacting Ethel Young at (213) 217-7677.

Under Metropolitan's Administrative Code Section 3100, property outside of Metropolitan's service area requires annexation prior to water being served. Section 3104(b) states, "water sold and delivered by the District shall not be used in any manner which intentionally or avoidably results in the direct or indirect benefit of areas outside 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." Promoting development of areas not annexed to Metropolitan, while receiving the benefit of imported water otherwise, would confer direct benefit to the City. If the City intends to approve development in the un-annexed area, it will need to annex the areas prior to development. See also Metropolitan's Administrative Code Section 4509, restricting use of imported water and its benefits to use within Metropolitan's service area. Excerpts of the relevant code sections are enclosed for reference.

We encourage projects within its service area to include water conservation measures while Metropolitan continues to build new supplies and develop means for more efficient use of the current system. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving the Final EIR and future environmental documentation on this Project. Please contact Ms. Brenda Marines at (213) 217-7902 or [bmarines@mwddh2o.com](mailto:bmarines@mwddh2o.com) if you require further assistance.

Very truly yours,



Sean Carlson,  
Team Manager, Environmental Planning Section

BSM:bsm  
SharePoint\Northside Specific Plan

Enclosures:

1. Project Figure
2. Excerpts from The Metropolitan Water District Administrative Code

↑ A9-3  
Cont.

A9-4

A9-5

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

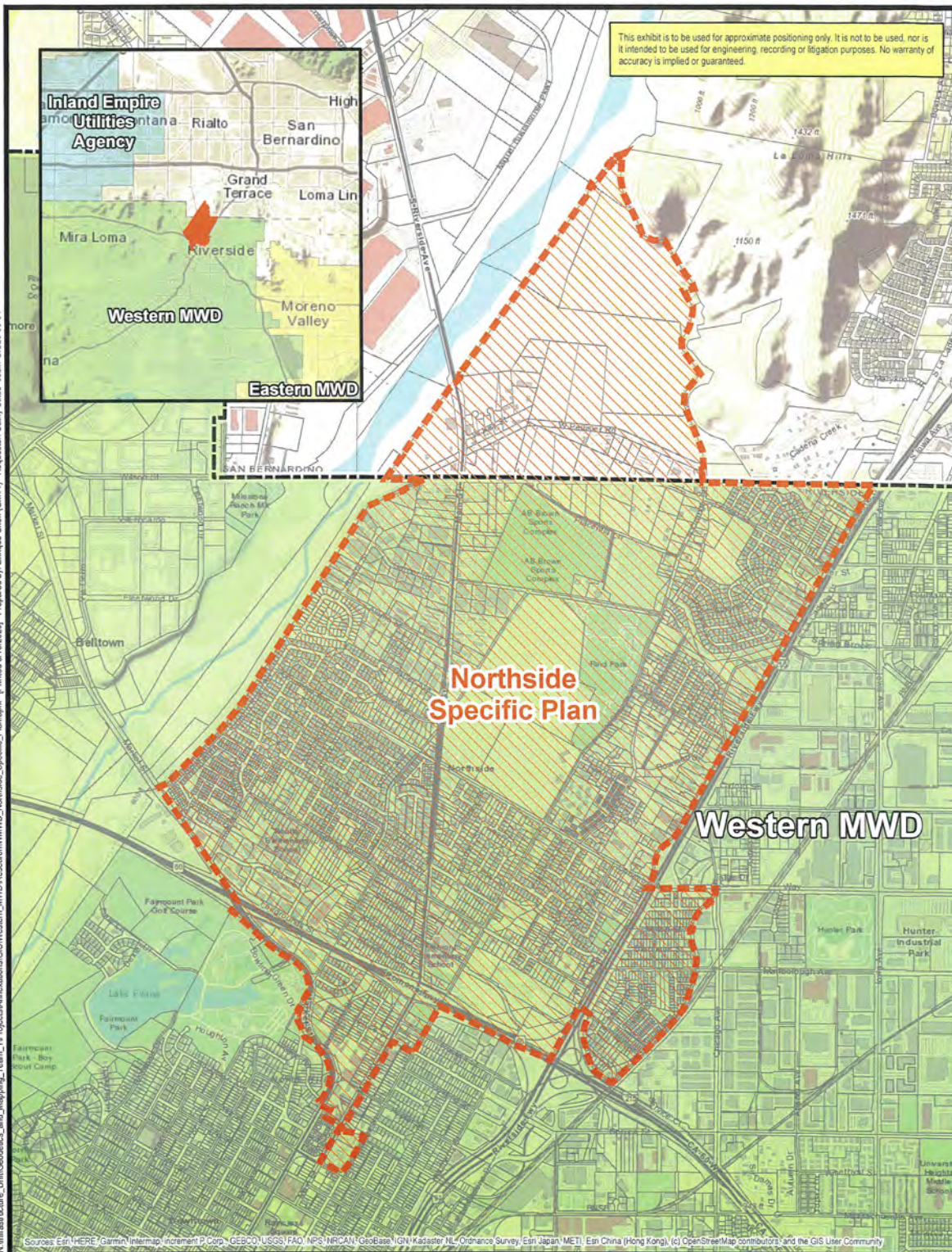
Mr. Jay Eastman  
Page 3  
May 20, 2020

cc: Samuel Martinez  
Executive Officer  
San Bernardino LAFCO  
[smartinez@lafco.sbcounty.gov](mailto:smartinez@lafco.sbcounty.gov)

Mallory Gandara  
Water Resources Specialist  
Western Municipal Water District  
[mgandara@wmwd.com](mailto:mgandara@wmwd.com)



N:\Infrastructure\_Utilities\_and\_Mapping\_Team\_1\Projects\Amenations\GIS\Western\_MWD\Research\MWD\_Northside\_Specific\_Plan.aprx [Printed 5/16/2020] Prepared by Enrique Chen (GMIT) Requestor: Cathy Sites Job# 6520-05-04



**Excerpts from The Metropolitan Water District Administrative Code**

**§ 3104. Mandatory Terms and Conditions.**

All terms and conditions of annexation shall contain the following provisions:

(a) 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 any manner which intentionally or avoidably results in the direct or indirect benefit of areas outside 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 4106 within the annexing area.

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

(e) The annexation shall be completed by the date established pursuant to Section 3108(a).

M.I. 38048 - January 9, 1990, paragraph (e) added by M.I. 40406 - August 24, 1993.

**§ 4509. Water Restricted to Use Within the District.**

In order to insure 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 4509 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.

Section 312.10 based on Res. 7260 - May 12, 1970; amended by M.I. 33642 - March 10, 1981. Section 322.10 repealed and Section 4509 adopted by M.I. 36464 - January 13, 1987, effective April 1, 1987.

Dear Jay,

Please see attached response letter to above mentioned project. If you have any questions or comments, please contact us.

Thank you for the opportunity to protect our cultural assets.

*Cheryl*

**Cheryl Madrigal**

Cultural Resources Manager

Tribal Historic Preservation Officer

Cultural Resources Department

**Rincon Band of Luiseño Indians**

1 West Tribal Road | Valley Center, CA 92082

Office: 760-297-2635 ext. 323 | Cell: 760-648-3000

Fax: 760-749-8901

Email: [cmadrigal@rincon-nsn.gov](mailto:cmadrigal@rincon-nsn.gov)



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# Rincon Band of Luiseño Indians

## CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082  
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov



April 22, 2020

**Sent via email: JEastman@riversideca.gov**

City of Riverside  
Jay Eastman  
3900 Main Street  
Riverside, CA 92522

**Re: Northside Neighborhood Specific Plan, State Clearinghouse No. 2019039168**

Dear Mr. Eastman,

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.

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.

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) 297-2635 or via electronic mail at [cmadrigal@rincon-nsn.gov](mailto:cmadrigal@rincon-nsn.gov).

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Cheryl Madrigal  
Tribal Historic Preservation Officer  
Cultural Resources Manager

T-2

T-3

T-4

Bo Mazzetti  
Chairman

Tishmall Turner  
Vice Chair

Laurie E. Gonzalez  
Council Member

Alfonso Kolb, Sr.  
Council Member

John Constantino  
Council Member



Citizens United for Resources and the Environment

May 26, 2020  
COMMENTS ON RIVERSIDE NORTHSIDE SPECIFIC PLAN

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 (DEIR) 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 counsel as part of this Plan to permanently adopt such restrictions.

O1-1

CURE's comments will not trigger recirculation of the DEIR as the proposed ideas and mitigation would result in fewer impacts than already studied. Nevertheless, CURE considers many of the mitigation measures proposed DEIR aimed at reducing increased negative impacts from additional development (particularly industrial or manufacturing development) to be either short-term, generic or aspirational at best and thus really would not benefit the public.

O1-2

Promoting genuine 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 baseline caused by the proximity of this area to Interstates 91 and 60 as well as Riverside's inability to control industrial land use in Colton. The current Specific Plan and DEIR 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.

O1-3

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 ensuring locally produced and

O1-4





## Citizens United for Resources and the Environment

hence more resilient production. Renewable energy production results in virtually no additional admissions and minor impacts during construction that can be mitigated 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 undisputed. 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 more extreme high temperature events will lead to more intense usage of air conditioning during hotter months. Moreover, customer demands will be further exasperated by predicted growth as well as global warming. Real world evidence supporting the validity of these conclusions 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 5,674 MW. On August 3, 2017, however, a new record peak load was established at 6,502 MW; an increase of 12% over a period of just two years.

[https://www.energy.ca.gov/sites/default/files/2019-11/Reg%20Report-%20SUM-CCCA4-2018-007%20LosAngeles\\_ADA.pdf](https://www.energy.ca.gov/sites/default/files/2019-11/Reg%20Report-%20SUM-CCCA4-2018-007%20LosAngeles_ADA.pdf)

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 RPU 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 site significantly more warehouses than white neighborhoods, after controlling for household income, land rent and many other variables.

<https://blog.ucsusa.org/science-blogger/warehouses-as-an-environmental-justice-issue>

Though warehouses increase some jobs, the cost is too high and the duration 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 2<sup>nd</sup> highest population-weighted particulate matter exposure, after Los Angeles, with just under 140% of the state average, with Riverside trailing closely behind in 8<sup>th</sup>.

<https://www.oxfordmartin.ox.ac.uk/downloads/academic/future-of-employment.pdf>

O1-4  
Cont.

O1-5



## Citizens United for Resources and the Environment

<https://www.ucsusa.org/sites/default/files/attach/2019/02/cv-air-pollution-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 increased the number of days when particle pollution soared to often 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 15<sup>th</sup> 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.lung.org/clean-air/outdoors/who-is-at-risk/highways>

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 morbidity. 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 per 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

<http://www.rampasthma.org/uploads/RAMPasthmaDieselWeb.pdf>

<https://www.theguardian.com/world/2020/may/04/is-air-pollution-making-the-coronavirus-pandemic-even-more-deadly>

Of particular relevance to the Northside, persons living within 500 meters of a highway risk developing COPD, premature death, heart attack, decreased lung function, poor cognition, and even dementia. The following resources outline both the impacts and the types of mitigation that should be adopting in the Specific Plan EIR.

<https://www.epa.gov/sciencematters/living-close-roadways-health-concerns-and-mitigation-strategies>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1971259/>

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

Though the RPU recognizes that tree planting reduces temperature and improves air quality, its programs to promote these mitigation measures are nascent and must be expanded. RPU 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

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Cont.

O1-6

O1-7

O1-8  
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## Citizens United for Resources and the Environment

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://thought-leadership-production.s3.amazonaws.com/2016/10/28/17/17/50/0615788b-8eaf-4b4f-a02a-8819c68278ef/20160825\\_PHA\\_Report\\_FINAL.pdf](https://thought-leadership-production.s3.amazonaws.com/2016/10/28/17/17/50/0615788b-8eaf-4b4f-a02a-8819c68278ef/20160825_PHA_Report_FINAL.pdf)

Tree planting also improves air quality by reducing temperatures and removing air pollutants. Trees further lead to decreased 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.nrs.fs.fed.us/units/urban/local-resources/downloads/Tree\\_Air\\_Qual.pdf](https://www.nrs.fs.fed.us/units/urban/local-resources/downloads/Tree_Air_Qual.pdf)

In the Inland Empire, trees and other greenspace 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 life, lowering risks of skin cancer and cataracts
- Encourage walking and more active lifestyles

[https://www.fs.fed.us/psw/topics/urban\\_forestry/products/2/cufr\\_52.pdf](https://www.fs.fed.us/psw/topics/urban_forestry/products/2/cufr_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 2006 field study found that about 15,000 inventoried street trees in Charleston, South Carolina were responsible for an annual net reduction of over 1,500 tons of CO<sub>2</sub>. These benefits were 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 this pollutant. In the summertime, generally 10 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—10 to 80 percent—because evergreen and deciduous trees have different wintertime foliage, with deciduous trees losing their leaves and allowing more sunlight through.

O1-8  
Cont.

O1-9

O1-10



## Citizens United for Resources and the Environment

[https://www.epa.gov/sites/production/files/2017-05/documents/reducing\\_urban\\_heat\\_islands\\_ch\\_2.pdf](https://www.epa.gov/sites/production/files/2017-05/documents/reducing_urban_heat_islands_ch_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 adopt in a neighborhood long overlooked by the City. The Northside area includes adequate land to incorporate solar and RPU is well situated to mitigate existing contaminations and improve health outputs by the City adopting mitigation that promotes trees, additional gardening, and more greenspaces. These ideas are not contrary to building more affordable housing and a destination 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,

Malissa Hathaway McKeith /S/

Cc: See Drop Box Link for Enclosures.

↑ O1-10  
Cont.

O1-11



# Northside Improvement Association

P.O. Box 244  
Riverside, CA 92502

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*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.

O2-1

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.

O2-2

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

O2-3

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

O2-3  
Cont.

O2-4

O2-5

O2-6

O2-7

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

↑ O2-7  
Cont.

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

↑  
O2-8  
↓

Leonard Mercier  
President, Northside Improvement Association





May 12, 2020

Honorable Mayor and City Council  
City of Riverside  
3900 Main Street  
Riverside, ca. 92522

**Re: Recommendation for the Northside Specific Plan**

Mayor and Council Members,

The Raincross Group believes that The Northside Specific Plan is a well thought out excellent plan for the future development of the Northside. We also believe that it can be improved in certain areas and therefore we make the following recommendations for changes to the Plan.

O3-1

**RECOMMENDED CHANGES**

1. A guiding principle of the Plan should be for the City to have as much control to implement the Plan as possible. Therefore we recommend that the 84 acres presently in the County of Riverside be annexed into the City and that the Plan reflect this.
2. The Plan should call for the Trujillo Adobe to be transferred to the City.  
This will increase the care and maintenance, the planning and implementation of the Adobe and the Spanish Town Development.
3. The Pellissier Ranch is owned by the RPU and we recommend that 25 to 50 acre be designated for immediate development of a passive 12.5 to 25 megawatt array. There are many significant benefits to this which include the following:
  - a. It would provide low cost power to Riverside users.
  - b. Vacant land would be put to productive use.
  - c. It can be built quickly.

O3-2

O3-3

O3-4

- 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.

↑ O3-4  
Cont.

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 Trujillo 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

O3-5

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.

O3-6

**THE RAINCROSS GROUP**

**Douglas Shackelton, President**

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

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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.

O4-1

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.

O4-2

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

Thanks,

O4-3

Nancy Melendez, President  
Spanish Town Heritage Foundation

# 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.

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:

O5-2

- As explained in our outline, *Springbrook Heritage Parklands & Walking Trails* encompasses the entire Springbrook Arroyo Watershed and its many treasures from the seismic 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.

O5-3

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, show 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 Norco's old-town with crushed granite walkways protected by a curb instead of concrete or asphalt sidewalks.
- 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.

O5-4

O5-5

O5-6



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

↑ O5-6  
Cont.

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:

↑ O5-7

- "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.
- "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.

↑ O5-8

↑ O5-9

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 Daft 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 someplace 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

↑ O5-10  
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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".

↑ O5-10  
Cont.

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 Navel Orange Tree.

↑ O5-11

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:

↑ O5-12

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 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.

↑ O5-13

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

↑ O5-14  
↓

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

↑ O5-14  
| Cont.

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 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.

| O5-15  
|

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  
[k.a.renfro7@gmail.com](mailto:k.a.renfro7@gmail.com)  
[info@springbrookheritagealliance.org](mailto:info@springbrookheritagealliance.org)  
[springbrookheritagealliance.org](http://springbrookheritagealliance.org)  
<https://www.facebook.com>



Photo by Stacey Mullaney

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.

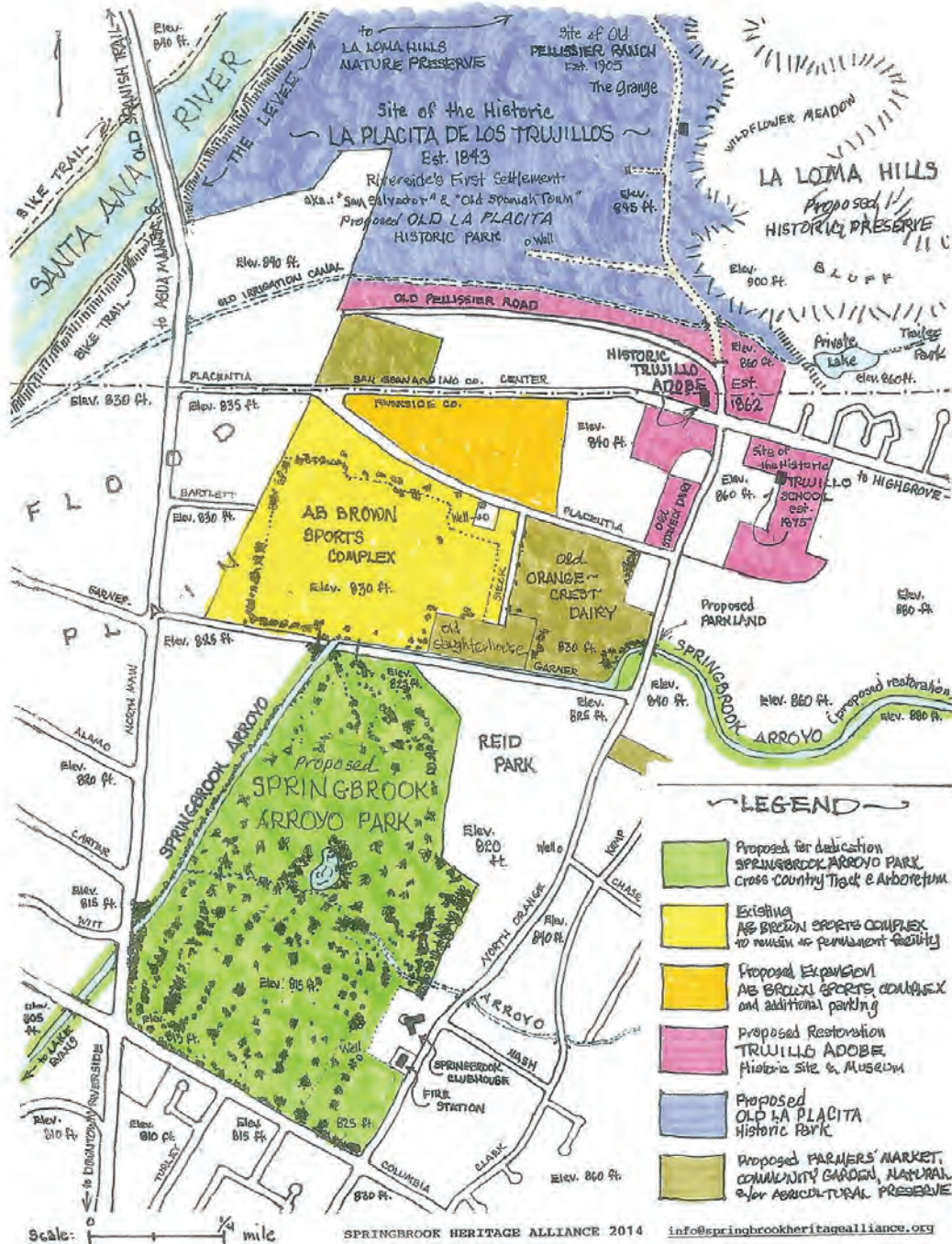
ATTACHMENTS:



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# SPRINGBROOK HERITAGE PARKLANDS & WALKING TRAILS

## Old Spanish Town Village District





# *Old Spanish Town Village District*

## **SPRINGBROOK HERITAGE PARKLANDS & WALKING TRAILS**

Riverside - Colton - Highgrove - Grand Terrace  
California U.S.A.

### **OLD SPANISH TOWN VILLAGE DISTRICT**

*Pellissier Ranch and La Loma Hills in Colton 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; Jurupa Rancho 1838; Bandini Donation 1843; La Placita de los Trujillos in 1843; Spanish Town 1870; Northside Improvement Association 1912.
- Archeological discoveries have already been made at La Loma Hills, Elliotta Hot Springs and other locations, high potential for more.
- Rezoned for Industrial-BMP by local Redevelopment agencies 1990.
- Active wells with underground river channel and other water resources--environmental constraints limit use.
- *Old Spanish Town Village District* calls for investor-driven rezoning of all Industrial and BMP-Business Manufacturing Park properties to uses compatible with protection of Springbrook Arroyo, Reid 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 2013), 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.
- Funds to be raised from private sources 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 SHA 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.
- Most of acreage is located within the original Bandini Donation boundaries and was part of La Placita.
- Our proposal calls for dedication of the entire 129 acres as a permanent public 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 19th-century style wrought iron or steel fencing using funds raised from private donors.
- No restrooms, drinking fountains, 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 skateboards, no skates, 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; fee-scale to be proposed.
- 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 additional Ab Brown Sports Complex open-space playing fields and parking.
- Funds to be raised from private donors.
- AYSO 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, descendent 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 Cahuilla 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 227-acre parcel as a historic site to be called *Old La Placita Historic Park*.
- La Placita village, the oldest settlement in Riverside County, was washed away in the Flood of 1862 then rebuilt on higher ground at the base of La Loma Hills. Its 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.osta.org](http://www.osta.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 profession.
- 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 rezoned 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, GrowRiverside trading post, pick-your-own seasonal produce, non-profit organization offices, etc.
- Development would be investor-driven, subject to land use and design review standards for the district.

#### **Endorsed by:**

Springbrook Heritage Alliance  
Northside Improvement 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:

[info@springbrookheritagealliance.org](mailto:info@springbrookheritagealliance.org)  
<https://www.facebook.com/springbrookheritagealliance>

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 assets include: the Springbrook Arroyo, Springbrook Falls, La Loma Hills, Pellissier Ranch (site of the village of La Placita de los Trujillos), the historic Trujillo Adobe, site of the Trujillo School, Riverside Championship Cross Country Course (site of former Riverside Golf Club), Ab Brown Sports Complex, sites of Orangecrest Dairy, Stavely Dairy and other farming operations, Sieck Meat Packing Co. building, late 19th-century Southwestern-style workingclass housing, Reid 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 serves 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 harm them or their neighborhood.

We ask you to adopt the Springbrook Heritage Parklands & Walking Trails plan, which includes the following destinations:

- a) **OLD SPANISH TOWN VILLAGE DISTRICT**  
Creation of a cultural heritage district from La Loma Hills Nature Preserve in Colton to Columbia Avenue in Riverside to promote small-scale private investment in themed-development to support the proposed Trujillo Adobe Museum complex, sports competitions, and residential neighborhoods; prohibit Industrial and large-scale development projects.
- b) **SPRINGBROOK ARROYO PARK, CROSS COUNTRY COURSE & NATIVE ARBORETUM**  
Dedication of the entire 129-acre former golf course, now in use as the Riverside Championship Cross Country Course, as a permanent park, arboretum and unimproved
- c) **AB BROWN SPORTS COMPLEX WITH POTENTIAL EXPANSION ACROSS PLACENTIA LANE**  
Dedication as permanent open space recreational facility, continue operations under current AYSO Region-47 management.
- d) **TRUJILLO ADOBE RESTORATION, MUSEUM & LIVING HISTORY CULTURAL CENTER**  
Develop the historic landmark as a focal point for Old Spanish Town Village District.
- e) **OLD LA PLACITA HISTORIC PARK**  
Dedication as permanent parkland and historic site, a destination for Trujillo Adobe, Old Spanish Trail and Spanish Town Village District visitors, venue for living-history performances and re-enactments. La Loma Hills to be dedicated as a Wilderness Preserve.
- f) **COMMUNITY GARDENS, OUTDOOR FOOD-ONLY FARMERS' MARKET, VILLAGE MARKETS, CRAFTS & GIFT SHOPS, FARM-TO-TABLE HISTORICAL RESTAURANTS, AND MORE...**  
Spanish Town Village District shops, neighborhood services and related venues on vacant Industrial parcels 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.

1	<i>Name please print legibly</i>	<i>Address number, street, apt.</i>		WARD
	<i>Signature</i>	<i>Zip Code</i>	<i>Telephone &amp;/or e-mail</i>	
2	<i>Name please print legibly</i>	<i>Address number, street, apt.</i>		WARD
	<i>Signature</i>	<i>Zip Code</i>	<i>Telephone &amp;/or e-mail</i>	

Please return to:  
SPRINGBROOK HERITAGE ALLIANCE  
P.O. Box 745, Riverside CA 92502  
(951) 987-0617

**From:** Karen Renfro <k.a.renfro7@gmail.com>  
**Sent:** Friday, May 15, 2020 4:57 PM  
**To:** Eastman, Jay  
**Cc:** Edwards, Erin; Erin Edwards; Welch, David; Kopaskie-Brown, Mary; Peter Wohlgemuth; erin snyder  
**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

O6-1

O6-2



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](mailto:k.a.renfro7@gmail.com)

↑ O6-2  
Cont.

O6-3





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**From:** William Lo <bl@billloconsulting.com>  
**Sent:** Thursday, May 21, 2020 2:22 PM  
**To:** Eastman, Jay  
**Cc:** Mark Tomich  
**Subject:** [External] 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 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 Pellessier 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").

O7-1

**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".

O7-2

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.

O7-3

The proposed Northside Specific Plan Land Use Plan eliminates the extension of Orange Street, from West Center Street to Pellessier 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

O7-4

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 Pellisier Road (Figure 3-1, page 28 of the Nssp) will be realigned to connect with Pellisier Road identified in the RRSP. However, exhibits 2 and 3 of the Nssp Traffic Study show a different alignment.

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. Pellisier Road”, “Pellissier Road”, “Old Pellisier 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. Pellisier 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 “Pellisier 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. Pellesier Road” for Figures 2-8 and 2-9, and to “Pellisier Road” in Figure 2-11. On page 3.4-34 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 RRSP, 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

O7-4  
Cont.

O7-5

O7-6

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.

↑ O7-6  
Cont.

**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.
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.

↑ O7-7

↑ O7-8

↑ O7-9

↑ O7-10

↑ O7-11

↑ O7-12

↑ O7-13

**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 RSSP.

↑ O7-14  
↓

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.

O7-14  
Cont.

Sunmeadows, LLC  
27127 Calle Arroyo, Suite 1910  
San Juan Capistrano, CA 92675

RECEIVED  
MAY 26 2020  
Community & Economic  
Development Department

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 Pellessier 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").

O8-1

**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.

O8-2

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".

O8-3

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.

O8-4



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.

O8-5

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".

O8-6

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.

O8-7

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.

O8-8

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.

O8-9

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. Pellesier Road" for Figures 2-8 and 2-9, and to "Pellisier Road" in Figure 2-11. On page 3.4-34 the street is again called "Old Pellissier Road". Inconsistent references to these two (?) roadways occur throughout the DPEIR and cause confusion for the reader.

O8-10

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 RRSP, 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.

O8-11

**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.

O8-12



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.
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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.
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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 RRSP.

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.

O8-13

O8-14

O8-15

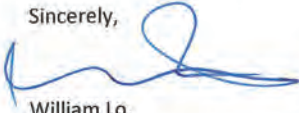
O8-16

O8-17

O8-18

O8-19

Sincerely,

A handwritten signature in blue ink, appearing to read 'William Lo', with a stylized loop at the end.

William Lo,

Managing Partner, Sunmeadows, LLC.

**From:** Ricardo Olea <[ricardo.o@ccaej.org](mailto:ricardo.o@ccaej.org)>  
**Sent:** Tuesday, May 26, 2020 3:15 PM  
**To:** Murray, David <[DMurray@riversideca.gov](mailto:DMurray@riversideca.gov)>  
**Cc:** Andrea Vidaurre <[andrea.v@ccaej.org](mailto:andrea.v@ccaej.org)>; Ivette Torres <[ivette.t@ccaej.org](mailto:ivette.t@ccaej.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).

O9-1

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.

O9-2

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.

O9-3

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.

O9-4

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

O9-5

Best,

**Ricardo J. Olea**  
*Center For Community Action and Environmental Justice*  
 3840 Sunnyhill Dr., Jurupa Valley, CA 92509  
 Office: (951)360-8451



**From:** Cynthia L. Eldred, Esq. <Cindy@eldredlaw.com>  
**Sent:** Thursday, May 7, 2020 3:52 PM  
**To:** Eastman, Jay  
**Subject:** [External] RE: REMINDER: Comment on the Draft Northside Specific Plan (Draft Plan) and Draft Program Environmental Impact Report (PEIR)!

Mr./Ms. Eastman –

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 MDR-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 10 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/zone 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/zone. 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 in conformance 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.

I1-1

I1-2

I1-3

I1-4

I1-5

I1-6

I1-7

Thank you in advance for your time and consideration.

Cindy Eldred

Cynthia L. Eldred, Esq.  
The Law Office of Cynthia L. Eldred, APC  
4303 Altamirano Way  
San Diego, CA 92103  
Main: (619) 233-7366  
Direct: (619) 233-7388  
Cell: (619) 277-7388  
[cindy@eldredlaw.com](mailto:cindy@eldredlaw.com)

11-7  
Cont.

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 <jeastman@riversideca.gov>

**Sent:** Monday, May 4, 2020 8:30 AM

**To:** Cynthia L. Eldred, Esq. <Cindy@eldredlaw.com>

**Subject:** REMINDER: Comment on the Draft Northside Specific Plan (Draft Plan) and Draft Program Environmental Impact Report (PEIR)!

[View this email in your browser](#)



REMINDER

Comment on the Draft Northside Specific Plan and EIR by May 26, 2020

The Draft Northside Specific Plan (Draft Plan) is still available for public review! The Draft Plan covers the Northside Neighborhood in the City of Riverside, Pellissier Ranch area in the southern portion of the City of Colton and the City's Sphere of Influence in the County of Riverside.

[Draft Northside Specific Plan \(Draft Plan\)](#)

The Northside Specific Plan's Draft Program Environmental Impact Report (PEIR) is also available for review.

[Draft Program Environmental Impact Report \(PEIR\)](#)

(PEIR Appendices can be viewed on the [Northside website](#))

The comment period for the Draft Plan and PEIR is 60 days, which started on Thursday March 26, and will **end on Tuesday May 26, 2020** (one extra day added because Memorial Day falls on Monday, May 25).

Comments on the Draft Plan and PEIR must be submitted in writing, either by mail or email:

Mail:

City of Riverside City Hall  
C/O Jay Eastman, AICP  
3900 Main Street, Riverside, CA 92522

Email:

[Comment on the Draft Northside Specific Plan](#)

[Comment on the Draft Northside Specific Plan EIR](#)

Questions on the Draft Specific Plan or DPEIR can also be directed to the e-mail

addresses above. We will strive to respond in a timely manner but appreciate your patience with the current COVID-19 closures and modified work hours.

The Planning Commission will consider the Specific Plan and DPEIR during a public hearing after the public review period. The date of the hearing will be determined at a later date, and a future public notification will be provided.

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**Our mailing address is:**

Community and Economic Development Department, City of Riverside  
3900 Main Street, Third Floor  
Riverside, CA 92522

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**From:** Sharon Kasner <momkasner@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 amend** the sections stating that ALL TRUCK TRAFFIC FROM COLTON VIA Main Street WILL MAKE A LEFT ON CENTER STREET TO ACCESS THE 215.

I2-1

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 to Columbia Avenue along West La Cadena Drive.

I2-2

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 these 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 to this situation!

I2-3

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 both Center Street and Columbia Avenues.

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

I2-4

Thanks,

Sharon Trujillo-Kasner, Secretary  
 Spanish Town Heritage Foundation



**From:** johnkrick@charter.net  
**Sent:** Tuesday, May 26, 2020 10:00 AM  
**To:** Eastman, Jay; Edwards, Erin  
**Subject:** [External] Northside Specific Plan

Private Recreation The former Riverside Golf Course and Clubhouse is still used by the community as a venue for various events and community meetings. However, the physical golf course area ceased operation and is no longer maintained at the same level it once was, only maintained for use as a cross-country racing venue. The existing trees on site are still in good condition and should be preserved or transplanted for future use. The Ab Brown Sports Complex is in good condition and appears to drain well. The fields are very well maintained, with a consistently mowed lawn and plentiful street trees along the perimeter for shade.  
appendix B page 16.

I  
13-1  
I

First, we know Ab Brown has changed. Existing trees preserved. We know that many have died and removed. The CC people have planted about a dozen new trees. Transplanting the trees on the course is not feasible. It would be extremely costly and a low percentage of survival. It also is not a fast process. Many of those trees have lived longer than they were expected to.  
(When I worked at UCR, there was a large tree outside my labs. The head grounds person was a friend and he detailed all the work they had to go through when they decided to build on that spot and move that tree. Well, I watched that out my window and it really was not a simple process. Older trees do not adapt well to different light paths. You have to keep it in the exact same solar orientation.)

I  
13-2  
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I have some thoughts as to keeping a CC course, but I think they have no idea of the magnitude involved. <https://www.youtube.com/watch?v=FcWbg95e8WY>

I

Finally, in the last several years downtown Riverside has had some bad floods. I have been in the Northside while this was happening. It wasn't flooding at the CC course or Ab Brown. Why, well first off the ground absorbs it all. But the vast number of gophers has immensely helped the absorption of the water into the aquifers below. There are two separate ones and Riverside depends on those. If that was not open space where would all of that water go? Straight to downtown. And you thought it was bad before? And if those aquifers are lost, where will our spare water come from? It is more than just a land commodity. What about aquifers? Ogallala, the famous giant one in the midwest. Happy, Texas used to use that water, and then they used it up and it never was replaced. Now they don't have water. When California had a drought, we were OK, partly because of the aquifer below this area. We had a savings account of water stored. Something to think about.

I  
13-3  
I

John Krick

GRESHAM SAVAGE  
COMMUNITY & ECONOMIC DEVELOPMENT

Brenti McManigala@GreshamSavage.com • San Bernardino Office  
(909) 890-1499 • fax (909) 890-9877

May 26, 2020

VIA Email [JEastman@riversideca.gov](mailto:JEastman@riversideca.gov) and [city\\_clerk@riversideca.gov](mailto:city_clerk@riversideca.gov)

City of Riverside  
Community & Economic Development Department  
Attn: Jay Eastman, Principal Planner  
Planning Division  
3900 Main Street, 3<sup>rd</sup> 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.

I4-1

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.

I4-2

✓ 501 E. 5th Street • 550 East Hospitality Lane, Suite 300 • San Bernardino, California 92408  
✓ 501 E. 5th Street • 401 West A Street, Suite 925 • San Diego, California 92101  
✓ 501 E. 5th Street • Mission Inn Plaza • Riverside, California 92501 (By Appointment Only)  
GreshamSavage.com

## **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.

I4-3

## **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.

I4-4

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

I4-5

### **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.

14-6

### **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.

14-7

#### **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 (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502).

I4-8

#### **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.*

I4-9

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 130 holding that in view of the virtually plenary power state entities, state entities are exempt from local zoning regulations).

I4-10

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

I4-11



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.

I  
14-12  
I

#### **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.

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14-13  
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#### **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 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.

I  
14-14  
I

Jay Eastman  
City of Riverside  
May 26, 2020  
Page 6

Please contact me with any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "B. McManigal", is written over a light blue rectangular background.

Brent R. McManigal, Attorney for  
GRESHAM SAVAGE  
NOLAN & TILDEN,  
A Professional Corporation

Cc: David Welch, [DWelch@riversideca.gov](mailto:DWelch@riversideca.gov)

**From:** Martin McHugh <bob7374@gmail.com>  
**Sent:** Friday, May 8, 2020 10:45 AM  
**To:** Eastman, Jay  
**Cc:** Bailey, Rusty; Edwards, Erin; Granillo, Donna; Martin McHugh  
**Subject:** [External] Septic Tank To Mains: Comment on the Draft Northside Specific Plan

Private and Confidential Within This Group:

Hi,  
My ongoing comment regarding the plan, was to connect all the residential Septic tanks to the main sewer pipes upstream of the Reid Park area. (At no cost to homeowners).  
This would allow those who will be playing, swimming, fishing in the Springbrook water not to be impacted by raw sewage runoff.  
I was told to contact 311. :(

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15-1  
I

Several months prior to the Corona Virus, there was an article on Flipboard Magazine warning about all the conditions were in place in San Francisco’s homeless downtown area for a Bubonic plague similar to the great London one.  
At a different local meeting, I brought the subject up and suggested (8) portable toilets be installed and maintained on Massachusetts Ave, across from the Homeless shelter.

I  
15-2  
I

Best Regards.  
Martin.

Sent from my iPhone

**From:** Nancy Melendez <nancy.melendez@icloud.com>  
**Sent:** Monday, May 25, 2020 9:10 AM  
**To:** Eastman, Jay  
**Subject:** [External] Northside Specific Plan comments

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.

I  
I6-1  
I

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.

I  
I6-2  
I

Thanks,

Nancy Melendez, President  
Spanish Town Heritage Foundation

Received on 05-26-2020 at 9:25 AM

From: Sala Ponnech <ponnech@att.net>, 3878 Pine Street, Riverside, CA 92506

---

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.

17-1

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.

17-2

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.

17-3



The EIR claims that CEQA contains no required method for assessing greenhouse gas impacts. However, the 2018 “Draft CEQA and Climate Change Advisory” (cited in the EIR bibliography) makes some points worth noting. First, the lead agency (City of Riverside) must impose all mitigation measures necessary to bring GHG emission to below significant levels unless it is not feasible (p. 14). I believe CEQA has more in mind than the City’s and County’s feel-good policy statements. Furthermore, GHG reduction is best done on site, so that both the project and the community can enjoy “co-benefits” (p. 16). Finally, the Advisory claims it is better to build landscape requirements into a project—such as this specific plan—so that future developers know up front what it will take to get their designs approved.

17-4

The “Northside Neighborhood and Pellisier Ranch Specific Plan” itself offers a bit more of what I am looking for. Section 3.8 makes landscaping an important component of the plan from the beginning, not just an afterthought. It requires that mature trees be saved in place or relocated, although there’s no indication of how many trees on the old golf course are over 24” in diameter. The problem is that the altered vegetation would need to have at least the same GHG mitigation capacity as the existing landscape, and preferably more to compensate for increased GHG generation on site. It will be difficult to tell without some calculations. I think these standards should also specify the sizes of new trees and shrubs because nobody should pretend that five-gallon saplings will replace mature trees in calculating capacity.

17-5

The “Old Spanish Town Village District” alternative plan contains much more: preservation of the golf course as open space with an arboretum and as many of the old trees as can be saved (pp. 6-14, 6-15), whether or not they have a 24” caliper. Combining this open space with enhanced landscaping in other areas might not only preserve present sequestration capacity but even offset some of the increased GHG generation from development in Pellisier Ranch.

17-6

**From:** Diana Ruiz <ruiz@rcrcd.org>  
**Sent:** Tuesday, May 26, 2020 5:26 PM  
**To:** Eastman, Jay  
**Cc:** Shelli Lamb  
**Subject:** [External] Comments on the Northside Specific Plan and Draft EIR.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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.

18-1

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.)

18-2

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.

18-3

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 of 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"?

18-4

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.

18-5

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.

Kind regards,  
Diana

Diana Ruiz  
Public Affairs Manager  
Riverside-Corona Resource Conservation District  
4500 Glenwood Dr., Building A  
Riverside, Ca 92501  
(909) 238-8338 Cell  
[www.RCRCD.org](http://www.RCRCD.org)

I  
18-6

Received on 05-25-2020 at 11:51 AM  
 From: Erin Snyder <epolcene@juno.com>

---

Erin Snyder's comments on Northside Specific Plan

- Overall I appreciate the time and effort of the plan and attention to the neighborhood including retention of open spaces, 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 so probably not very realistic.
- Pellisier 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 NSPA and owned by us, the ratepayers. 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 Sandals Church. (I have more to say about Air Quality and the proposed uses on Pellisier Ranch but I'll get back to it.)
- A great deal of the NSPA 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 1969. While this is considered in the PEIR, I don't think the NSP 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 business 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 the 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 Pellisier Ranch. (2.4.8)

A9-1

A9-2

A9-3

A9-4

A9-5

A9-6

- Section (2.4.9) addresses industrial uses which I do not support, especially warehouses. 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)
- Is the Public Facility space at orange and Columbia still being considered for Police Department.? (2.4.11)

I9-7

I9-8

I9-9

Section 3.1 addresses Land use and regulations. I had some questions in section 3.5 Use Tables.

- Agricultural uses are identified in the TAHV 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 uses identified in the TZO the only allowable uses?

I9-10

Section 4.1 addresses circulation mobility and trails

- (4.2) The NSP proposes an arterial road east from Main St. to La Cadena Dr. and the 215 Interstate. Also proposed is the upgrade of Center St. to a 4 lane arterial. (5.1 #7)
- 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 #14) Until Center St. upgrades are completed this 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 Colton lateral as soon as it is completed.

I9-11

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 PEIR.

I9-12

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

Section 3 Project Description ( I did 3.2 Air Quality, 3.3 Biological and 3.7 Green House Gas)

- 3.2 Air Quality
  1. One concern is that Table 3.2-1 Ambient Air Quality Standards and Table 3.2-3 Local Ambient Air Quality Data are not comparable and unhelpful.

I9-13





	<div>2. 3.2.3 Approach and Methodology and Table 3.2-6 Construction Scenario Assumptions, identify that cumulative effects will impact non-attainment.</div> <div>3. Tables 3.2-8 through 3.2-10 Trip Rate Assumptions shows no recreational trips which does not consider sports and recreational focus.</div> <div>4. Section 3.2.4 Impact Analysis Identifies 10 Air Quality impacts of potential significance and</div> <div>5. Section 3.2.5 Mitigation measures – identifies mitigations for impacts.</div> <div>6. Section 3.2.6 Levels of Significance After Mitigation - all impacts even after mitigation are considered significant and unavoidable.</div>	I9-13 Cont.
<div>• 3.3 Biological</div> <div>1. Other jurisdictional requirements if met, along with any identified mitigations could result in less than significant impact.</div> <div>2. My concern is who hires the required Certified Biologist?</div>	I9-14	
<div>• 3.7 Green House Gases</div> <div>1. Section 3.7.3 Thresholds of Significance again recognizes that projects could have additional cumulative impacts.</div> <div>2. Section 3.7.4 Impact Analysis p. 3.7-41 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 1000 ea. Could be approximately 15,803,000) Industrial figures should be used the difference is the 3000 MT CO2 for mixed use and 10,000 MT CO2 for Industrial therefore skewing the findings of less than significant impact to Green House Gas emissions.</div>	I9-15	
<div>Section 4 Cumulative Effects</div> <div>All environmental impacts identified are significant if taken cumulative. Findings are significant and unavoidable in all areas except energy, population, public facilities, recreation, utilities and wildfire.</div>	I9-16	
<div>Section 5 Other CEQA considerations</div> <div>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.</div>	I9-17	
<div>5.2 addresses Growth-inducing effects, and include the statement “It must not be assumed that growth in any area is necessarily.....of little significance to the environment.”</div>	I9-18	

Section 6 Project Alternatives. I agree that the Springbrook Heritage Alternative (misnamed Old Spanish town District is the best alternative. We could easily address represented deficiencies. While the City of Riverside Alternative is also good there are some areas that could have a more negative impact than the proposed NSP, although most impacts are the same or less.

19-19

#### Section 8 Agencies consulted

I have concerns because I feel throughout the document and process there are areas where relevant local entities are not identified and therefore are they not involved. Particularly there are three land conservancies in the NSPA Colton Wildlands Conservancy, Rivers and Lands Conservancy and Santa Ana River Conservancy of the Ca. Coastal Conservancy. Also not referenced is the Santa Ana River Parkway and Open Space plan or the City of Riverside Master Trails Plan and the current PACT initiative. There are opportunities in the Northside for participation from these organizations regarding trails and open space.

19-20

**From:** judy tanner <judyreidtanner@gmail.com>  
**Sent:** Monday, May 4, 2020 1:22 PM  
**To:** Eastman, Jay  
**Subject:** [External] Comment on the Draft Northside Specific Plan

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

# Allen Matkins

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## 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@riversideca.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. 2019039168, "DEIR").

I11-1

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].)

I11-2

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

I11-3

Jay Eastman, Principal Planner  
City of Riverside, Planning Division  
May 25, 2020  
Page 2

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

I11-3  
Cont.

I11-4

I11-5



Jay Eastman, Principal Planner  
City of Riverside, Planning Division  
May 25, 2020  
Page 3

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 nonconforming use.

I11-5  
Cont.

## 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 zones as  
established by the Specific Plan's base zoning designations. In the City of Riverside,  
the TZO ~~allows-authorizes for Business/Office Park existing and entitled~~ land uses to  
continue and expand, where such uses either (1) were in existence or (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  
~~5~~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~~350,000 SF)

**Second edit:** ~~CP~~

I11-6

Jay Eastman, Principal Planner  
City of Riverside, Planning Division  
May 25, 2020  
Page 4

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.

I11-6  
Cont.

## 2. Draft EIR Comments and Proposed Revisions

### A. Transition Zone Overlay

#### 1. Transition's Comments

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.

I11-7

#### 2. Transition's Proposed Revisions

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:

- **Edit to text on page 2-13:** The TZO would allow existing ~~B/OP and Commercial~~and fully-entitled 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 B/OP designation would also apply to the east side of Main Street as alternative, near 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 ~~B/OP and~~fully-entitled uses within the City of Riverside, and M-1 uses within the City of Colton, to continue, and to transition to HDR and IRP uses as market conditions

I11-8

Jay Eastman, Principal Planner  
City of Riverside, Planning Division  
May 25, 2020  
Page 5

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 for~~ existing and fully-entitled uses to continue to operate ~~under a Business/Office Park and C 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 for~~ 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 (B/OP) land~~ uses to High Density Residential (HDR) land uses (Policy LU-1.9).

I11-8  
Cont.

## **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.

I11-9

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.)

Jay Eastman, Principal Planner  
City of Riverside, Planning Division  
May 25, 2020  
Page 6

## 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.

I11-10

### 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.

I11-11

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 (*Laurel 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:

I11-12

~~The CHRIS record search results indicate that there is one (1) previously recorded~~

Jay Eastman, Principal Planner  
City of Riverside, Planning Division  
May 25, 2020  
Page 7

~~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 but not evaluated (Status 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 (NETR 2019; UCSB 2019).~~

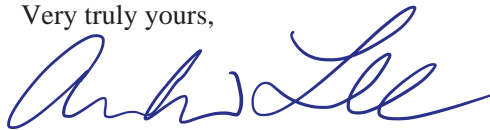
~~The change in use could potentially result in a significant impact to the setting of 3667 Placentia Lane (P-33-006973), if the property is reevaluated and found to be an historical resource under CEQA. Any future projects that affect Subarea 4 would require the reevaluation of this property. Thus, impacts 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 -site that was unevaluated~~ in 2015 and found to be of no historical significance~~resources 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 site that was unevaluated~~ in 2015 and found to be of no historical significance~~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. (*Galante Vineyards 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)

I11-12  
Cont.

I11-13



Allen Matkins Leck Gamble Mallory & Natsis LLP  
Attorneys at Law

Jay Eastman, Principal Planner  
City of Riverside, Planning Division  
May 25, 2020  
Page 8

Kristi Smith, Chief Assistant City Attorney (via e-mail)  
John Condas (via e-mail)

# Allen Matkins

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## VIA EMAIL

August 21, 2018

Board of Riverside Public Utilities  
Jo Lynne-Russo-Pereyra, Board Chair  
David Austin, Board Vice Chair  
David M., Crohn, Ward 1/Citywide  
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Steve Adams, Ward 7  
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").

Board of Riverside Public Utilities  
City of Riverside City Council  
Rusty Bailey, Mayor  
August 21, 2018  
Page 2

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; Concepts 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.

## **1. 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 "[s]trictly limit any redesignations or rezoning of land from industrial use" and "[a]void 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.

Board of Riverside Public Utilities  
City of Riverside City Council  
Rusty Bailey, Mayor  
August 21, 2018  
Page 3

- **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." LUE, 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. LUE, 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 consideration" where residential and commercial/industrial land uses interface. LUE, 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 lilac areas east of Main Street).



Board of Riverside Public Utilities  
City of Riverside City Council  
Rusty Bailey, Mayor  
August 21, 2018  
Page 4

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.



Board of Riverside Public Utilities  
City of Riverside City Council  
Rusty Bailey, Mayor  
August 21, 2018  
Page 5

## **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 status, 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).<sup>1</sup> 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

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<sup>1</sup> However, it should be noted that the optional Concept A of the proposed Specific Plan would only rezone the eastern half of the Property. See Concept A.

Board of Riverside Public Utilities  
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 Gunite; 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 effected 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 his letter directed to Mayor Baily on March 15, 2018, Mayor Richard DeLaRosa explained that the proposed Specific Plan's Concepts 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

Board of Riverside Public Utilities  
City of Riverside City Council  
Rusty Bailey, Mayor  
August 21, 2018  
Page 7

warehouse just north of Center Street. Thus, the mixed-use, multi-family project that the proposed Specific Plan would create – 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 "[t]here is still a strong demand for new industrial space within the Inland Empire" and that "[n]ew, 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.

Allen Matkins Leck Gamble Mallory & Natsis LLP  
Attorneys at Law

Board of Riverside Public Utilities  
City of Riverside City Council  
Rusty Bailey, 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,

A handwritten signature in blue ink, appearing to read "Andrew Lee". The signature is fluid and cursive, with the first name "Andrew" and the last name "Lee" clearly distinguishable.

Andrew Lee

AL:slp

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

Enclosure 1

# Allen Matkins

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## Via Email/U.S. Mail

April 15, 2019

Jay Eastman, AICP, Principal Planner  
3900 Main Street, Third Floor  
Riverside, CA 92522

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's ("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 opposed the City's *then-proposed* conceptual Specific Plan. (See Enclosure, attached.) Our August 21 letter detailed how the then-proposed 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 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 businesses' 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.



Allen Matkins Leck Gamble Mallory & Natsis LLP  
Attorneys at Law

Jay Eastman, 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 new, mostly residential, base zoning for these areas. (Project Description, pp. 3, 4-5.) As outlined in the Project Description, the TZO would remain indefinitely active, augmenting the land uses authorized under base zoning and continuing to authorize 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 attributes:

- **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 entitled 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. Erik Friess, Esq.  
Colleen J. Nicol, City Clerk (via e-mail)

Enclosure 2



Received on 05-26-2020 at 1:39 PM  
 From: Pete Wohlgenuth <pjdnw@yahoo.com>

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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.

I12-1

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 Wohlgenuth, Hydrologist  
 Northside Neighborhood

**From:** Jim Wood <minwood2@earthlink.net>  
**Sent:** Wednesday, May 27, 2020 8:36 AM  
**To:** Karen Renfro  
**Cc:** Eastman, Jay; Welch, David; Kopaskie-Brown, Mary; Murray, David; Brian Mooney; Richard O'Neill; Brian Stephenson; Joan Isaacson; Eva Yakutis; Michiko Morisaki; Springbrook Heritage Alliance; NorthsideIA@yahoogroups.com; RiversideTamaleFestival@gmail.com; osta.aguamansa@gmail.com  
**Subject:** [External] Re: SPRINGBROOK HERITAGE ALLIANCE RE: NORTHSIDE SPECIFIC PLAN COMMENTS

May I repost 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 Elliotta Plunge White Sulfur Springs location on Strong St. is now being developed.  
 Respectfully,  
 James Wood, resident  
 951-684-0143  
[minwood2@earthlink.net](mailto:minwood2@earthlink.net)  
<https://tinyurl.com/essaysandstuff>

I 113-1

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 - 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.

#### 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 seismic 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, show 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 Norco's old-town with crushed granite walkways protected by a curb instead of concrete or asphalt sidewalks.

- 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.
- "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 Daft 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 someplace 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 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 Navel 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 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.

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 be 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 anxious 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  
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<https://www.facebook.com>

ATTACHMENTS:



Virus-free. [www.avg.com](http://www.avg.com)

<2014 SHA Park Plan 2017-08-15 001 map.pdf><SHAparkproposal.pdf><SHApetition (1).pdf>