

Good Neighbor Guidelines Update – Summary of Comments and Responses

Comments received for May 28, 2020 Planning Commission Hearing				
Number	Source	Position	Comment	Staff Response
1	Chambers of Commerce Task Force	No position	Clarify when electrical hookups for refrigerated trucks are required – if a refrigerated facility is proposed, or any facility that may be visited by refrigerated trucks.	<p>This provision requires hookups for facilities 10ksf-100ksf only where the use of refrigerated trucks (TRUs) is proposed, and to make this requirement standard for facilities over 100ksf regardless of whether TRUs will be used.</p> <p>This requirement could, at the direction of the City Council, be modified to require the utility infrastructure for future installation of electrical hookups in buildings over 10ksf, should they become necessary.</p>
			Clarify when designated truck/haul routes must avoid residential zones/uses and sensitive receptors generally	<p>The intent of this provision is to discourage truck traffic through residential areas to the extent feasible.</p> <p>Given the nature of monitoring and enforcement of this proposed regulation in the context of land use policy, staff recommends that this provision be removed from the proposed amendments.</p>
			Consider tying compliance with standards to findings of no impact per CEQA in order to streamline development process.	This would require a full environmental analysis of potential new development that is unknown and is beyond the scope of the direction that City Council and the Land Use Committee provided to establish policies.
			Blanket requirement for air quality studies may imply potential air quality impact on sensitive receptors.	<p>A Health Risk Assessment requirement is proposed for new industrial development within 1,000 feet of a residential zone or use, and for any proposed warehousing & distribution facility generating more than 150 truck trips per day, consistent with guidance provided by ARB and SCAQMD. These studies will determine whether the specific proposal is anticipated to have on sensitive receptors.</p> <p>LUC requested that this distance be studied to determine if it should be increased. Staff maintained the 1,000 feet distance consistent with WRCOG and AQMD recommendations.</p>
			Regulations should not be overly restrictive and should be paired with incentives or areas where regulations are relaxed Consider relaxed regulations in exchange for project enhancements (extra landscaping, etc.)	<p>The proposed regulations are focused on proximity to residential uses. Greater flexibility is permitted in areas where impacts to sensitive receptors are less likely.</p> <p>The proposed modified permit requirements for warehousing & distribution facilities allow for the consideration of modifications to development standards in conjunction with the appropriate use permit, adding additional flexibility where appropriate.</p>

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			Building height limits and operating hours restrictions are not compatible with E-Commerce operations	<p>The proposed regulations protect sensitive receptors and residential uses from negative impacts related to industrial facility operations.</p> <p>In some specific cases, there may be sufficient reason to vary or modify some of these standards to balance quality of life with economic development goals. This would be evaluated on a project-specific basis as part of the overall entitlement process.</p>
2	Letter from Chambers of Commerce	No position	Request continuance of 28 days	
3	Letter from Magnon Co.	No position	Request continuance of 28 days	
4	Letter from NAIOP	No position	Request continuance of 28 days	
5	Email from Lee & Associates	Oppose	Proposed regulations will negatively affect the feasibility of a previously proposed project.	<p>Staff received an email regarding a potential project that was reviewed as a CDR. No entitlement application has been received for this site to date; when an application is submitted, staff will work with the developer to meet the spirit of the GNG and zoning changes while creatively pursuing the specific needs of the project as it relates to rock outcroppings, open space, biological resources, and nearby residential uses.</p>
			Request continuance (no time frame)	
6	Text – Allison Ellingson	Oppose	800-foot buffer from residential for buildings over 100ksf precludes most warehouses	<p>This comment is accurate, as the intent of the regulations is to protect residential areas from larger, more impactful industrial operations.</p> <p>Each development will be evaluated individually to determine if there is a way to accommodate what is proposed.</p>
			Landscape requirements do not address second-story line-of-sight issues	<p>The increased landscaped setback at the property line provides additional space for larger plantings that would address this issue, should the specifics of the site and surrounding uses require it.</p> <p>The lower maximum height of 35 feet within 200 feet of residential will reduce the visual impact of building mass.</p>

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			Language of regulatory provisions should be as flexible as possible (“Where feasible,” “If possible,” etc.)	<p>The proposed zoning regulations have been designed to incorporate as much flexibility as possible while balancing quality of life and public health priorities with economic development and growth.</p> <p>Compliance with standards can be modified or varied as appropriate.</p>
7	Letter from FORH	Support if amended	Regulations related to building size, height limits, truck routes, screening requirements, etc. apply to development within certain distance of residential zones or uses, but not to other sensitive receptors.	<p>Many sensitive receptors (schools, parks, open space) are already located within a residential zone and thus would be covered under the proposed changes.</p> <p>To expand the number of non-residential sensitive receptors covered by the Zoning regulations, staff considered adding the PF Zone to the areas subject to building height, size, mass and operation restrictions. However, it was determined that this modification would be onerous on industrial development sites and therefore is not recommended.</p>

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Number	Source	Position	Comment	Staff Response
1.	Chambers of Commerce Good Neighbor Guidelines Task Force Comment Letter	N/A – Recommended Changes	<p>The current proposal, without modification, will considerably hinder industrial development and manufacturing in Riverside.</p> <p>The proposed mandates should be converted into design guidelines and consider a performance standard approach to reduce air quality/diesel emission impacts associated with new industrial development projects to sensitive receptors by way of a Health Risk Assessment (HRA) to assist in the selection of appropriate project design features. An HRA approach will better help the City understand and mitigate air quality health concerns for adjacent residential communities and other sensitive land uses, while also providing consistency for industrial developers with reliable guidelines and project design features to move development forward and meet City standards.</p>	<p>Staff identified approximately 54 vacant, industrially zoned potential development sites citywide to which the GNG would apply. Not all of the identified sites will be affected by all of the proposed regulations, depending on how near the site is situated to sensitive receptors.</p> <p>With the updated GNG-2020 and proposed Zoning Code amendments, staff developed a policy document and regulations that balance quality of life and public health priorities related to the sensitive receptors with the economic requirements of successful industrial development.</p> <p>The City has design guidelines in place for industrial development that have resulted in conflicts between sensitive receptors and industrial development. The design guideline approach has not been successful and resulted in several situations where litigation has occurred.</p> <p>In 2016, City Council recognized this and directed staff to develop clear regulations to minimize these conflicts and balance the needs sensitive receptors and industrial uses. Staff was directed to develop clear, robust Good Neighbor Guidelines that are codified and implemented through the Zoning Code. This will ensure developers understand the City’s expectations while also providing residents with an understanding of the requirements for new development. Regulations, unlike guidelines, provide clarity, certainty and predictability to the development process.</p> <p>Health Risk Assessments are included in the proposed Title 19 changes and help identify project-specific health impacts and identify appropriate mitigation.</p>

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			Review industrial building setbacks on a case-by-case basis upon view, health and noise metrics.	<p>All proposed developments will be evaluated individually, both for compliance with codes and standards and to identify and mitigate project-specific impacts or compatibility concerns. The proposed entitlement processes (Design Review, Minor CUP or CUP) are based on the size of the warehouse & distribution facility and enhance public input and provide opportunities to mitigate potential impacts for larger projects.</p> <p>At the same time, the MCUP and CUP process allows a developer to request modifications to most of the proposed standards, which are then evaluated on a case-by-case basis providing flexibility based on the specific site conditions. This approach allows for additional flexibility to consider the unique circumstances of each situation, without requiring the project to undergo the Variance process.</p>
			Consider withholding the proposed amendment to permit requirements for buildings between 10,000K and 100,000K. Keep 400,000K building size as the ceiling for the MCUP requirement. Assess industrial development fewer than 400,000K on a case-by-case basis.	<p>The proposed changes to Title 19 modify the entitlement process to a tiered approach based on industrial building size. The tiered approach recognizes that different building sizes, and the industrial uses they host, have different potential impacts on surrounding uses. As the building size increases, the potential for impacts also increases.</p> <p>The new process would require a Design Review, an administrative review process, for buildings up to 10,000 SF, which is consistent with the General Plan description of the Business/Office Park land use. A Minor CUP, approved by the DRC, would be required up to 100,000 SF because impacts are likely to increase. With development standards in place, impacts can be identified and mitigated, and development standards could be modified where site-specific circumstances warrant it. The Conditional Use Permit would be required for building over 100,000 SF and would require a public hearing at Planning Commission. This would allow for public input on those uses that may potentially have impacts on sensitive receptors.</p> <p>Both the MCUP/CUP process allow staff, working closely with the developer and other stakeholders, to address and reduce site-specific or design-specific impacts not covered by the proposed Title 19 changes.</p>

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			Each project is unique in nature and “one-size-fits all” regulations can pose restrictions that discourage development.	<p>Staff agrees and this has been the approach taken for the proposed changes. The tiered approach, paired with the ability to request modifications through the MCUP and CUP processes based on development and operational needs of the site, minimizes the need for Variances.</p> <p>By providing clear and consistent regulations for a variety of land use contexts, the proposed regulations allow for each individual industrial use to be considered based on its specific needs.</p>
			Consider relief on guidelines for projects that have a freeway separating the development from residential communities.	<p>Staff agrees. While there are a limited number of situations in the City where this condition occurs, staff recommends this be added to the proposed regulations.</p> <p>Staff would not recommend including the requirement to prepare a Health Risk Assessment in this modification to ensure that potential public health impacts are adequately assessed.</p>
			Assess ingress/regress impact for development with trucks NOT traveling through residential neighborhoods.	<p>The proposed regulations are designed to ensure that truck traffic avoids residential areas to the maximum extent feasible, recognizing that this may not always be possible given the diverse patterns of development across the City.</p> <p>Siting of driveways, access roadways, docks and loading areas are only required to be oriented away from sensitive receptors where sites are within proximity to such receptors, and therefore greater site design flexibility is possible the further away a site is from these sensitive receptors.</p>
			Identify clear measurement metrics for the starting and ending points for HRA assessment (i.e., from back of a house to building, property line to property line, etc.).	<p>Staff agrees and will provide additional clarification.</p> <p>As proposed, the 200-, 800- and 1,000-foot buffers from residential zones or uses would be measured from the property line of the residential zone or use, measured to the industrial building in question (not industrial property line).</p>

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			Building heights and the proposed arbitrary setbacks from the property line are one of the major concerns from developers regarding this policy, especially if setbacks are in addition to the other requirements of 200-800 feet from sensitive receptors including residential development.	<p>The proposed setback regulations were developed based on City Council direction (2016). Building setbacks are proposed to be increased by 10 feet when adjacent to a residential zone or use and building heights proposed to be reduced by 10 feet within 200 feet of a residential zone or use. This will reduce the likelihood of visual impacts of industrial development on sensitive receptors, especially residential uses.</p> <p>In special or unusual circumstances, a variance could be requested provided that the circumstances are justifiable and will be determined on a case-by-case basis. All other existing height and setback requirements remain the same and have not been changed.</p>
			Remove the limited hours of operation; instead, project features that mitigate noise and light concerns against residential uses. In the manufacturing industry often overnight hours and time-of-use rates are needed for Riverside to remain competitive.	<p>As proposed, the restrictions on operating hours for warehousing and distribution facilities may be modified if it can be demonstrated that the proposed operation will not have noise impacts on sensitive receptors. Through the through the MCUP/CUP process, a modification to the hours of operation limits may be requested and no variance would be required. This allows for the specific site and use conditions to be considered.</p> <p>However, to reduce potential ambiguity among existing and proposed regulations, Staff are recommending that the proposed regulations be modified to remove the hours of operation restrictions in favor of reiterating that operations must comply with the existing nighttime exterior noise level limits established in Title 7 – Noise. A Noise Study would still be required to verify that these standards are met.</p>
			Recognize senior versus junior land uses and landowner rights. Conduct an assessment on current land uses and the dates they came to be.	<p>This comment requests that different standards be developed for industrial development where residential uses adjacent to the site were established after the industrial land use designation was applied to the site.</p> <p>While this level of analysis is outside the scope of this amendment, as residential development occurs in proximity to established or designated industrial land uses, the opportunity to require disclosure of existing or planned industrial development to future residents can be applied through the entitlement process.</p>

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			<p>Include a list of project design features/incentives including Vehicle Miles Traveled (VMT) credits, clean-tech, clean emission truck fleets, appropriate siting of truck driveways, appropriate siting of loading docks, etc.</p>	<p>All projects will be evaluated during the entitlement process to assess project design features, including low-emission fleets, clean-tech and similar approaches, to ensure compatibility with sensitive receptors. This could include how driveways are sited, the location of docks and other operational characteristics.</p> <p>The MCUP/CUP process allows for project-specific mitigation measures, design features, or conditions of approval to reduce project-specific impacts that may not be covered by the proposed regulations. The MCUP/CUP process also allows for modifications to be considered providing flexibility for the developer.</p>
			<p>Assess the impacts of Title 7 (Noise) restrictions on industrial development.</p>	<p>All uses and development within the City must comply with the existing provisions of Title 7 (Noise). Title 7 noise level limits are consistent with best practices.</p>
			<p>Provide clarification if an existing building needs to expand, would this trigger the new criteria for development?</p>	<p>Staff agrees and can recommend clarifying this in the proposed Title 19 - Zoning amendment.</p> <p>Existing, non-conforming buildings and uses will not be subject to the proposed regulations. Any expansion or modification would be subject to the proposed regulations.</p>

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			Articulate the impact to existing industrial developments and those in the pipeline. Will current developments be grandfathered in?	<p>Staff agrees.</p> <p>Existing, non-conforming buildings and uses will not be subject to the proposed regulations. Any project that has been granted entitlements or building permits are subject to the regulations in effect at the time of issuance. Projects currently under review may or may not be subject to the proposed regulations, depending on the timing of their approval.</p> <p>Additionally, based on feedback received during the public outreach process, staff recommends that proposed development projects having submitted a substantially complete application be subject to the regulations in place at the time that the application was determined to be substantially complete. A <i>substantially complete application</i> is an application that meets all of the applicable Zoning and Specific Plan standards, requires no significant revisions to meet requirements that are regularly applied to development projects, and contains enough information to complete a required CEQA analysis of potential impacts and mitigation measures, whether or not that analysis and the related public review process has been completed</p>
			Provide clarity on the new definition for warehousing and distribution facilities when stating “NOT manufacturing” as many developments may have partial manufacturing or assembly spaces included on smaller parcels.	<p>This definition would not apply to a primary manufacturing use with an incidental warehouse/storage component. A warehousing and distribution facility, as a primary, permitted land use, would be subject to this definition even if it includes incidental manufacturing/assembly functions.</p> <p>Each case will be reviewed to determine which is the primary and which is the incidental use based on the square footage designated for each use and the use itself.</p>
			If a project has been submitted for approval the task force recommends that it be exempt from the yet to be adopted Good Neighbor Guidelines.	Generally, development applications will be required to comply with regulations in effect at the time of approval. However, based on feedback received during the public outreach process, staff recommends that proposed development projects having submitted a substantially complete application be subject to the regulations in place at the time that the application was determined to be substantially complete.
			Provide a timeline and date for implementation.	The proposed regulations, if adopted, will take effect 30 days after final City Council adoption, unless stayed by recommendation of the City Council.

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2.	Letter from Friends of Riverside’s Hills	Support if amended	Recommends implementation of Staff recommendation in response to previous FORH letter, to expand regulations to include the PF – Public Facilities Zone as well as residential zones and uses.	Adding the PF – Public Facilities Zone would extend the building height and size limitations proposed to additional properties not covered by the current proposal, which is limited to properties zoned residential or developed with a residential use. However, this modification would potentially impact more industrial development sites. As such, it is not recommended for incorporation into the proposed amendments.
			Regulations should include parks, open space and sensitive receptors located outside of City limits.	As written, the proposed regulations apply to properties with a residential zone or use, which is not limited only to properties within the City.
3.	Letter from Chambers of Commerce	Oppose	Requests continuance to allow additional consultation with development and industrial stakeholders.	
			Requests a City-facilitated workshop session to include development community, project applicants and key stakeholders.	
			Current “one-size-fits-all” approach not in the best interest of City or residents.	The proposed regulations have been designed to balance maximum flexibility for individual development projects while maintaining adequate protections for sensitive land uses from air quality, noise, neighborhood character and other impacts associated with industrial development. The proposed use-specific regulations for warehousing & distribution facilities are paired with the ability to modify certain regulations through the MCUP/CUP process, which is not available in the current regulations; as such, the proposed regulations are more flexible rather than less. As with all development projects, each application will be evaluated individually and on its own merits as it relates to environmental impact, neighborhood compatibility and other factors. Project-specific mitigation measures will be applied as necessary on a case-by-case basis as required by CEQA.

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4.	Letter from NAIOP	Oppose	The proposed regulations are a “one-size-fits-all” approach.	The proposed regulations have been designed to balance maximum flexibility for individual development projects while maintaining adequate protections for sensitive land uses from air quality, noise, neighborhood character and other impacts associated with industrial development. The proposed use-specific regulations for warehousing & distribution facilities are paired with the ability to modify certain regulations through the MCUP/CUP process, which is not available in the current regulations; as such, the proposed regulations are more flexible rather than less. As with all development projects, each application will be evaluated individually and on its own merits as it relates to environmental impact, neighborhood compatibility and other factors. Project-specific mitigation measures will be applied as necessary on a case-by-case basis as required by CEQA.
			Requests continuance to allow time for additional review and consultation.	
			Proposed regulations are not necessary - due to regional air quality improvements related to technological advancements in the goods movement industry.	The proposed regulations are consistent with the most recently available guidance specific to industrial land uses and air quality from CARB and SCAQMD. However, impacts on sensitive land uses from industrial development and land uses are not limited to air quality concerns. The proposed regulations also address concerns related to noise impacts and neighborhood character/aesthetic impacts associated with building height, bulk and configuration.
			Proposed regulations are “blanket rules” that may hinder economic growth and will not adequately improve air quality.	The proposed regulations have been designed to balance maximum flexibility for individual development projects while maintaining adequate protections for sensitive land uses from air quality, noise, neighborhood character and other impacts associated with industrial development.
			The appropriate approach to balancing industrial development and quality of life is the CEQA process.	All projects subject to CEQA will continue to be evaluated for potential impacts and appropriate mitigation measures, as they are currently. The proposed regulations provide an additional degree of certainty for sensitive land uses as well as the development community as they will the design and siting of projects which will then be subject to detailed CEQA analysis. Additionally, the proposed regulations provide an extra layer of protection from potential impacts from projects that are otherwise exempt from CEQA review.

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			The basis of the WRCOG Guidelines and GNG-2008 are derived from California ARB guidance from 2005 and is therefore outdated, including the ARB guideline recommending a 1,000-foot buffer between warehouse/distribution uses and sensitive receptors.	Staff recognizes that the available guidance documents have not been updated in some time; however, in the absence of guidance informed by more recent data, and in the interest of consistency with existing policy guidance at the regional and State level, it is appropriate to continue to rely on the referenced document. Additionally, the proposed regulations depart from the ARB guidance document which recommends a minimum 1,000-foot separation of warehousing & distribution facilities and sensitive land uses; instead, the proposed regulations only require preparation of a health risk assessment for industrial uses within 1,000 feet of residential zones or uses.
5.	Letter from CCAEJ	Support if amended	Recommend modifying regulations to avoid siting new warehouse/distribution centers and industrial facilities within 1,000 feet of sensitive land uses, regardless of size.	The proposed regulations employ a tiered approach to building size based on the distance from residential zones and uses in order to reduce potential impacts related to industrial operations. This approach was taken in order to balance the quality of life and health considerations for sensitive land uses with opportunities for economic development and growth. All industrial projects located within 1,000 feet of a residential zone or use, and any warehousing & distribution facility over 100,000 square feet, will be required to prepare a Health Risk Assessment to identify and mitigate emissions-related health impacts.
			Requests that the City account for the configuration of existing warehouse/distribution facilities when siting new residences and other sensitive land uses.	All residential projects are and will continue to be evaluated relative to compatibility with surrounding land uses. Appropriate buffering, screening and other compatibility enhancements are employed as needed, on a case-by-case basis.
			Recommends that the GNG-2020 clearly distinguish between building setbacks and buffer zones.	Staff can support a recommendation to revise the proposed language of the regulations to more clearly differentiate between setbacks, which typically do not allow buildings within them, and buffer zones, which can allow buildings but in a limited fashion or with special design considerations such as height and mass.
			Recommends the regulations require a cumulative impact analysis and HRA for new industrial facilities within 2,000 feet of sensitive receptors.	Staff would recommend maintaining the 1,000-foot threshold as it is consistent with CARB and WRCOG guidance. Warehouse & distribution facilities over 100,000 square feet would be required to prepare an HRA even if outside of the 1,000-foot buffer area under the proposed regulations.

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			<p>Recommends that the proposed 60-foot building setback be increased for larger buildings and that the setback be applied to vehicle parking areas as well as buildings.</p>	<p>The proposed 60-foot building setback is applicable to industrial sites that share a common property line with a residential zone or use. The proposed regulations also limit buildings within 200 feet of such a shared property line to no larger than 10,000 square feet and no taller than 35 feet. This combination of development limitations serves to minimize impacts and land use compatibilities between residential and industrial uses. The 60-foot building setback is not applied to industrial sites that share common property lines with commercial or other industrial properties, as those uses are less sensitive than residential.</p> <p>Parking areas adjacent to residential zones and uses is common throughout the City, and the two uses are not necessarily incompatible. The required landscaped buffer between industrial facility parking areas and residential zones and uses has been increased from 5 to 15 feet in order to provide additional protection to sensitive land uses.</p>
			<p>Recommends increased vegetation requirements, including requiring 24-inch-box tree planting around buildings and along all internal vehicular circulation routes.</p>	<p>Landscape planting design is typically reviewed at the Staff level and is highly contingent on the specifics of a particular development site. For this reason, Staff have not recommended minimum spacing, container sizes, species or locations for tree planting; however, Staff could recommend modifying the proposed regulations to include minimum spacing and container size provisions for landscaped buffer areas adjacent to residential zones and uses.</p>
			<p>Supports modified permit requirements requiring a Minor CUP for buildings over 10,000 square feet and a CUP for buildings over 100,000 square feet.</p>	
6.	e-Comment	No position	<p>Recommends evaluation of environmental impact (pollution, etc.) of warehouse construction near neighborhoods, as well as impact on property values.</p>	<p>All projects will continue to be assessed for potential environmental impacts as required by CEQA. Effects of development on surrounding property values is not an environmental impact covered by CEQA.</p>

Good Neighbor Guidelines Update – Summary of Comments and Responses

Comments received for September 17, 2020 Planning Commission Hearing				
No	Source	Position	Comment	Staff Response
1.	Springbrook Heritage Alliance	Oppose	The proposed amendments will undo the Good Neighbor Guidelines altogether.	The proposed amendments will serve to codify the policies articulated in the updated Good Neighbor Guidelines by incorporating them into the Zoning Code. The current GNGs do not have any regulatory authority.
2.			The proposed amendments should be reviewed further under CEQA.	Staff reviewed the proposed amendments as required by CEQA and determined that further CEQA review is neither required. There is no information available that the City can use to analyze, identify and mitigate any specific impact created by the proposed amendments. Specific development projects will continue to be subject to full CEQA review as appropriate.
3.			The proposed screen wall requirements are ambiguous.	The proposed amendment would increase the minimum height of solid screen walls from six to eight feet. The proposed amendments do provide the CEDD Director with additional discretion to consider other types of screening only where the surrounding conditions warrant it, such as sites where there are no nearby residential land uses or other sensitive receptors.
4.			Under CEQA a worst-case analysis is required.	No requirement to assess a “worst-case” scenario exists under CEQA. There is no assumption of no potential impact; rather, there is insufficient information available to assess the potential for impacts related to the proposed regulations.
5.			The proposed Transition Overlay Zone of the proposed Northside Specific Plan is inconsistent with the proposed regulations for the Industrial zoning districts in the Zoning Code, which prohibit residential uses in any Industrial zone.	<p>The proposed amendments to Title 19 being considered are not related to the allowed land uses within the Transition Overlay Zone of the proposed Northside Specific Plan.</p> <p>If the proposed GNG-2020 and related regulations and the proposed Northside Specific Plan are adopted, each would independently apply (i.e., the Northside Specific Plan would regulate allowed land uses within the Specific Plan area, and the proposed amendments would regulate the development of industrial properties Citywide).</p>
6.			An examination of the interplay between the proposed GNG-2020 and the proposed Northside Specific Plan is needed.	The proposed Northside Specific Plan is written to apply Title 19 development standards to industrial development where it would be allowed within the Specific Plan.
7.			Industrial development should be prohibited where prevailing winds place it upwind of sensitive land uses.	The proposed amendments do not make warehouse uses possible where they were not possible before. The specific air quality and health impacts of an individual development project would continue to be assessed on a project-by-project basis as required by CEQA.

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8.			Full EIR should be prepared	The generic nature of the proposed amendments – the City has analyzed the project to the extent possible given the information available that is not speculative – there is no evidence to support an argument for adverse environmental impact
9.			Cumulative impact analysis is needed	There are no known cumulative effects of the proposed amendments as the effects of the proposed amendments are too speculative for such an analysis. The proposed amendments to not include any new or intensified land uses beyond what is currently allowed by the existing Zoning Code, Specific Plans and General Plan.