

# COMMENT LETTERS

**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  
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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.

A2-4

#### 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.

A2-5

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.

A2-6

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

A2-7  
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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 (6) 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 ~~strikethrough~~):

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.**

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~~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.

A2-19

- 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~~

A2-20

~~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

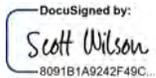
**CONCLUSION**

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:  
Scott Wilson  
8091B1A9242F49C...

Scott Wilson  
Environmental Program Manager

ec: Cindy Castaneda, Environmental Scientist  
Inland Deserts Region  
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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-axle 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 FZO 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

Northside Specific Plan & DEIR  
May 21, 2020  
Page 8 of 8

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:

A3-42

- 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.-

A3-43

A3-44

A3-45

**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 Placencia 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?

A3-46

A3-47

A3-48

A3-49



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



- 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.

A3-65

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

A3-66

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.

A3-67

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.

A3-68

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?

A3-69

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

A3-70



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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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**MINAGAR & ASSOCIATES, INC.**

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

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:

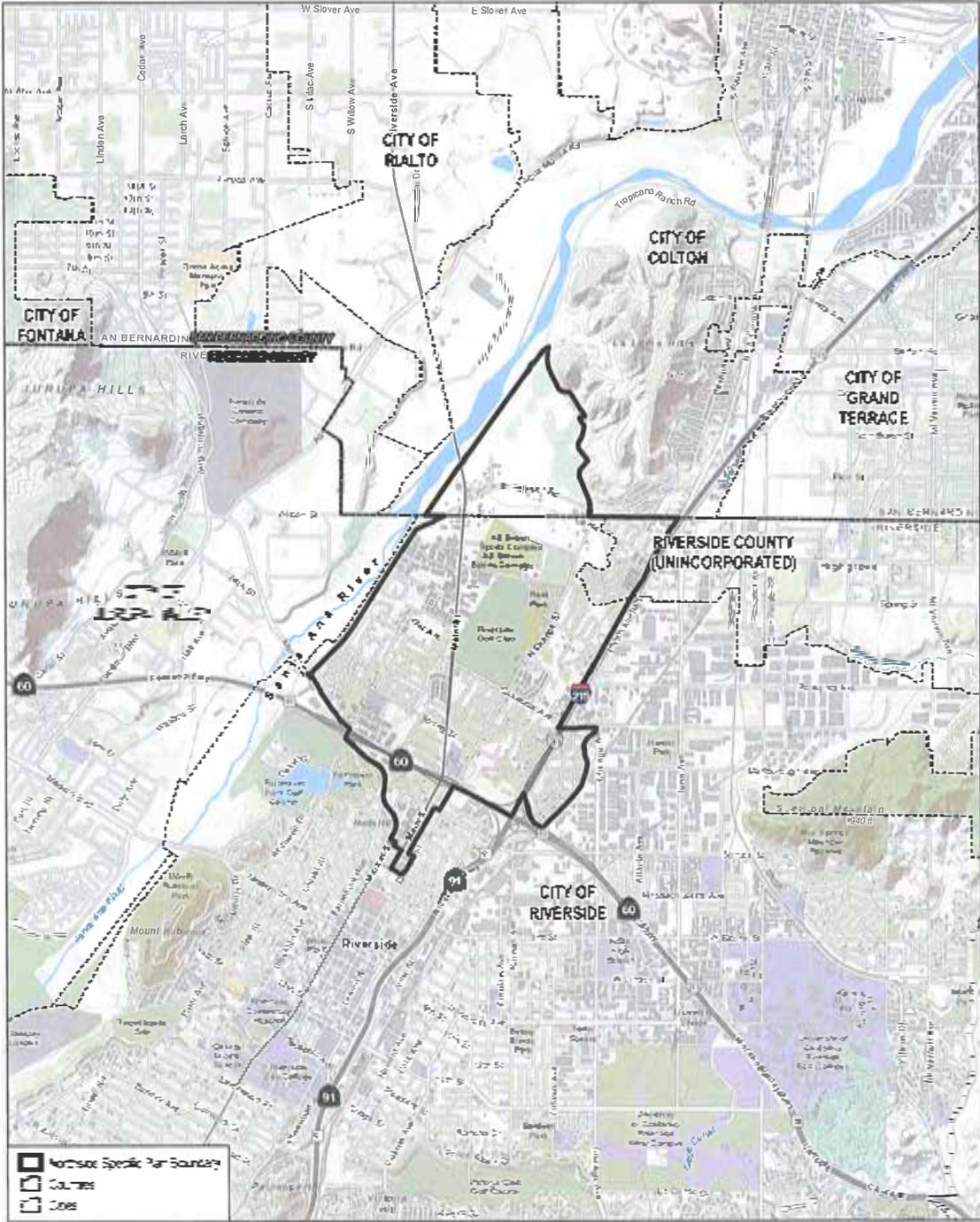
**LEAD AGENCY:**

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 Bernadino County 2020; ESRI Basemap



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JASON E. UHLEY  
General Manager-Chief Engineer



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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.

A6-1

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.

A6-2

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

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)

A6-2  
Cont.

**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.

A6-3

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.

A6-4

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.

A6-5

Very truly yours,

  
for DEBORAH DE CHAMBEAU  
Engineering Project Manager

Attachment

cc: Riverside County Planning Department  
Attn: John Hildebrand

SLJ:rlp

**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)

|  
A7-1  
|

\*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.



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

May 19, 2020

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

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

## **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)10, and PM2.5 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, PM10, and PM2.5 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.1 (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 NOx emissions. Requiring the use of ZE heavy-duty trucks supports South Coast AQMD’s efforts to attain state and federal air quality standards as outlined in the 2016 AQMP, specifically for NOx emissions reductions. Requiring the use of ZE heavy-duty trucks also fulfills the Lead Agency’s legal obligation to mitigate the Proposed Project’s significant construction air quality impacts and complies with CEQA’s requirements for mitigation measures. Therefore, South Coast AQMD staff recommends that the Lead Agency 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.

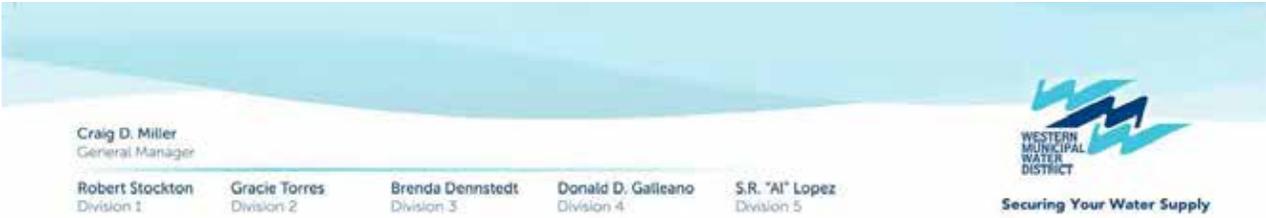
↑  
A7-15

<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).



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).

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**

**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 an unincorporated County of Riverside. Within the City of Colton area of the SPA, 227 acres (the Pe'lisser 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), Truilo Adobe Heritage Village (TAHV), Outdoor Commercial Recreation (OCR), Light Industrial (IM-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 build-out 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 FIR (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:

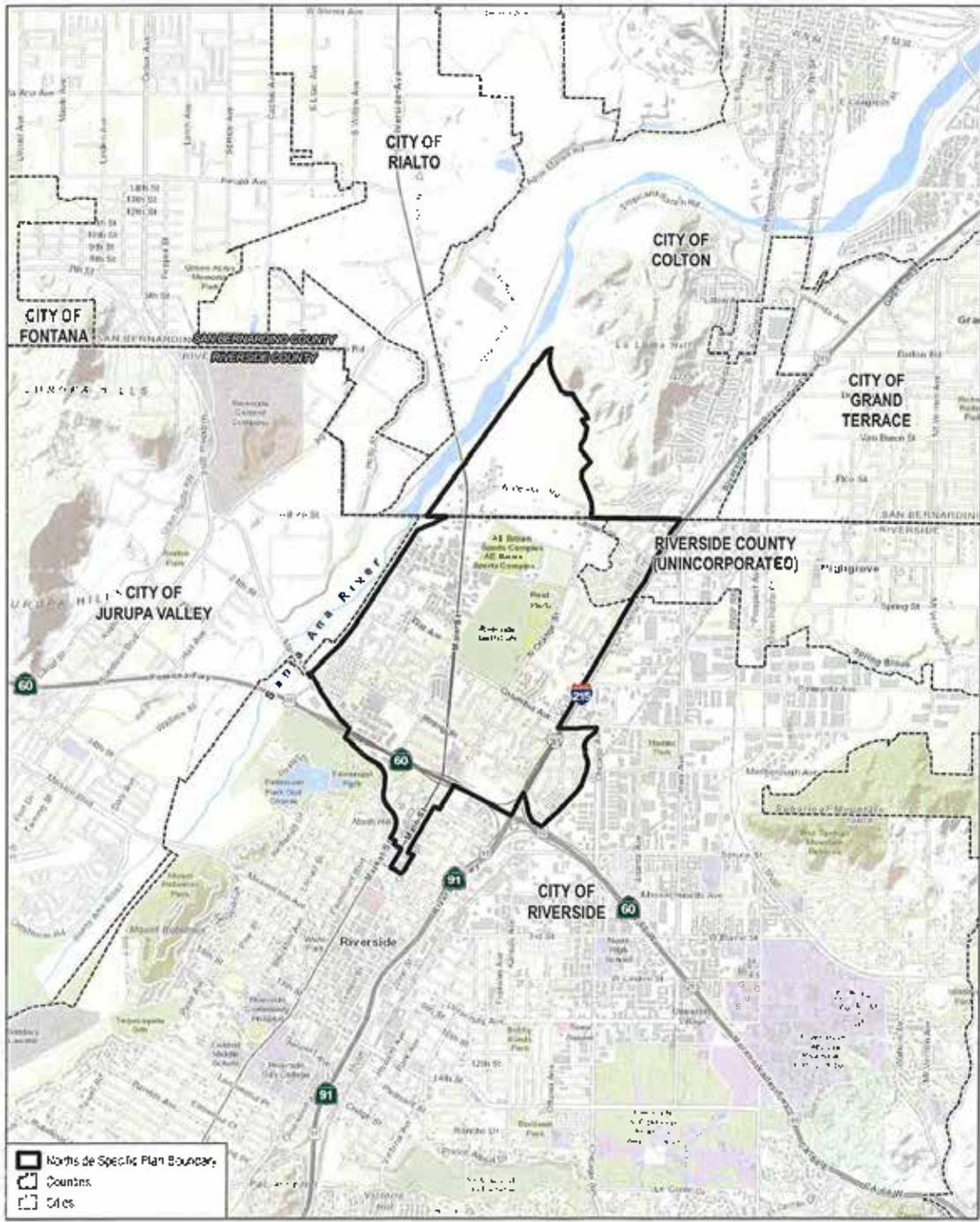
**LEAD AGENCY:**

City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main Street, 3rd Floor  
Riverside, California 92522  
Attn: Jay Eastman, Principal Planner  
(951)826-5764  
[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.

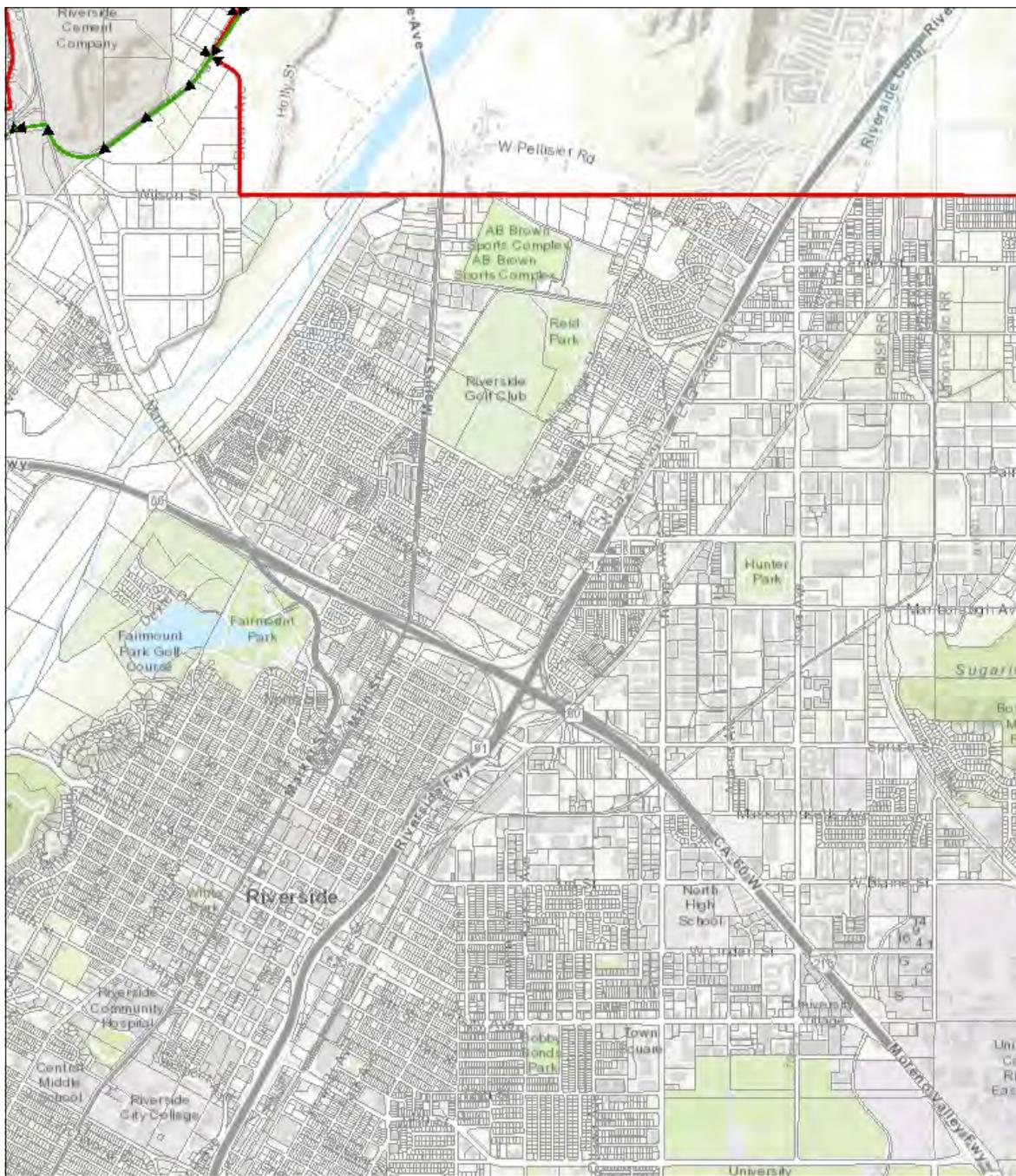


City of Fontana 2017, City of Riverside 2017, City of Grand Terrace 2017, City of Riverside 2017, City of Riverside 2017, City of Riverside 2017

**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  
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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.

↑ A9-3  
Cont.

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.

A9-4

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@mwadh2o.com](mailto:bmarines@mwadh2o.com) if you require further assistance.

A9-5

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

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Mr. Jay Eastman  
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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)



**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.D. 38,948 - January 9, 1990, paraphrased and added by M.D. 40,096 - 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. 7289 - May 12, 1970, amended by M.D. 33642 - March 10, 1981 - Section 322.10 repealed and Section 4509 adopted by M.D. 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)

T-1



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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.

T-2

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.

T-3

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).

T-4

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

Sincerely,

Cheryl Madrigal  
Tribal Historic Preservation Officer  
Cultural Resources Manager

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



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.ucusa.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



<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

O1-5  
Cont.

O1-6

O1-7

O1-8



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 CO2. 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

*Organized 1912 • Oldest Community Organization in Riverside*

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

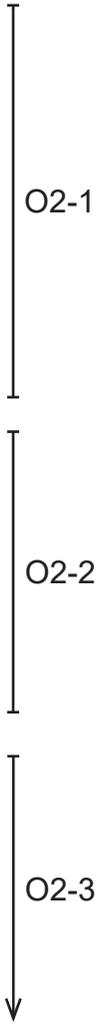
This response addresses the concerns of the Northside Improvement Association regarding the proposed development associated with the Northside Specific Plan and PEIR.

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

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

There are a few areas of concern, however.

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



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



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.

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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.

O4-3

Thanks,

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.

O5-1

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:

↑ O5-10  
↓

- 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".

↑ 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.

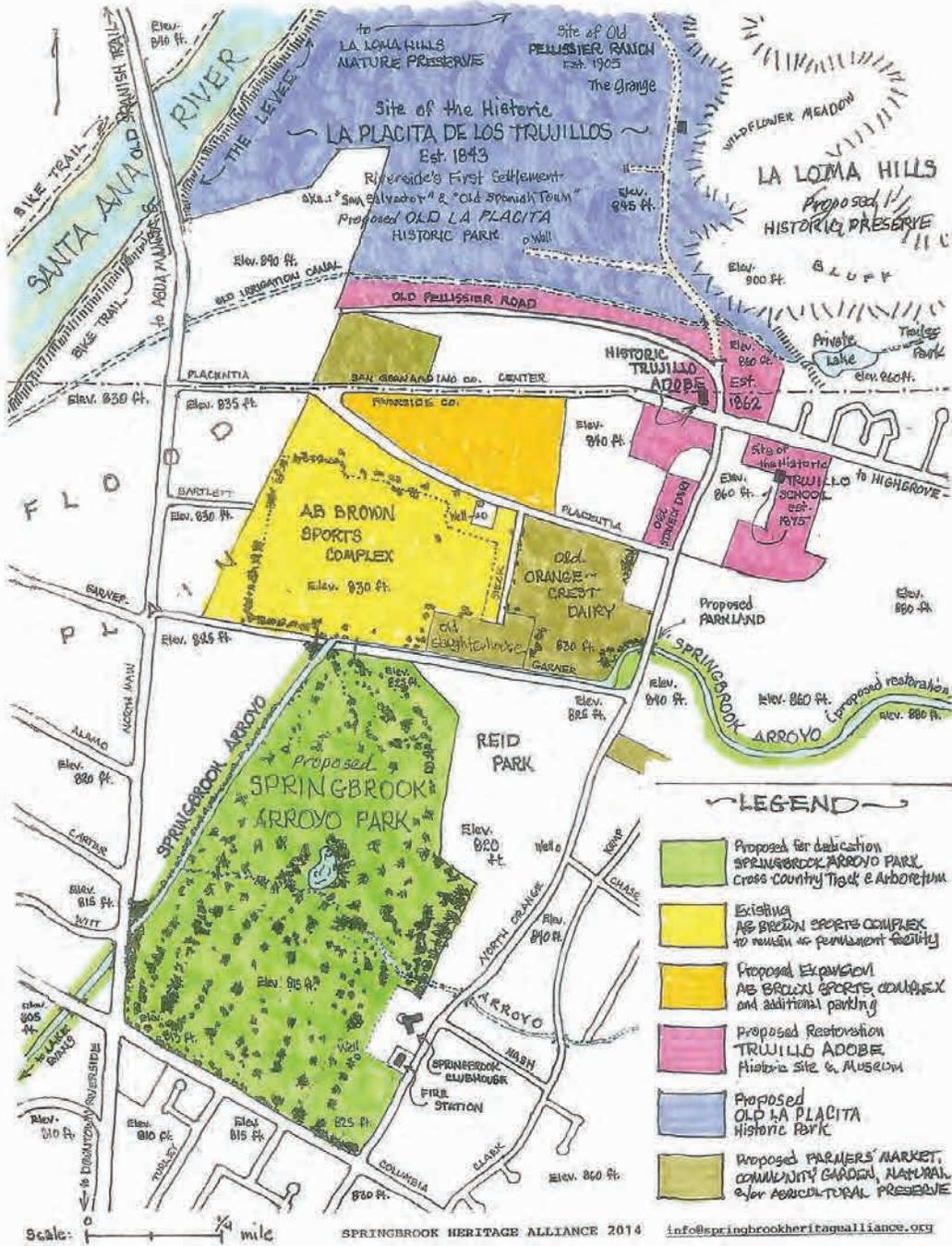
ATTACHMENTS:



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

*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



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@billoconsulting.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”).

07-1

**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.

07-2

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”.

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.

07-3

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

07-4

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.

↑ 07-6  
| 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.

↑ 07-7

↑ 07-8

↑ 07-9

↑ 07-10

↑ 07-11

↑ 07-12

↑ 07-13

**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.

↑ 07-14  
↓

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 Pellesier 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 "Pellissier 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.
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.
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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.
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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.

O8-13

O8-14

O8-15

O8-16

O8-17

O8-18

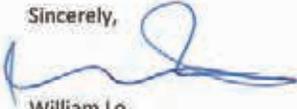
**Recommendation:**

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.

O8-19

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,

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

William Lo,

Managing Partner, Sunmeadows, LLC.

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

09-1

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.

09-2

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.

09-3

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.

09-4

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

09-5

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 –

I1-1

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”).

I1-2

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.

I1-3

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”).

I1-4

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.

I1-5

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.

I1-6

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.

I1-7

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

[Add us to your address book](#)

Want to change how you receive these emails?

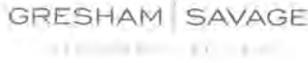
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Breni McManigal@greshamsavage.com | San Bernardino Office  
(909) 890-1499 - fax (909) 890-9877

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.

14-1

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.

14-2

**Background**

As the City is aware, this area has been utilized for industrial development for years and the demand for industrial uses remains strong. Pursuant to our Client's April 25, 2019 letter in response to the Notice of Preparation for the EIR, the Property has been actively pursued by industrial developers consistent with the demand in the area. The Northside area has been allowed to develop in a hodge-podge manner, and while the Specific Plan is an attempt to stop prior practices, it will only exasperate those past practices and further expand incompatible land uses.

14-3

**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.

14-4

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.

14-5

### 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 J, 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.5<sup>th</sup> 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 592).

14-8

**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.*

14-9

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).

14-10

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

14-11

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.

14-12

#### **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.

14-13

#### **Recommendation**

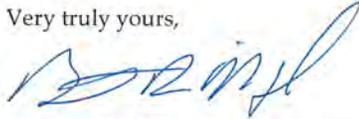
Based on the following, we request the City revise the Northside Specific Plan to allow for the existing business/office zoning designations to remain and the City focus its efforts on supporting and promoting the growth of job-producing industries and appropriate residential development. The Northside 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.

14-14

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", written in a cursive style.

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  
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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.

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| 15-2  
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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.

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| 16-1  
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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.

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| 16-2  
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Thanks,

Nancy Melendez, President  
Spanish Town Heritage Foundation



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.

18-4

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)

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18-6  
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Received on 05-25-2020 at 11:51 AM  
From: Erin Snyder <epolcene@juno.com>

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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)

19-7

19-8

19-9

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?

19-10

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.

19-11

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.

19-12

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.

19-13

<ul style="list-style-type: none"> <li>2. 3.2.3 Approach and Methodology and Table 3.2-6 Construction Scenario Assumptions, identify that cumulative effects will impact non-attainment.</li> <li>3. Tables 3.2-8 through 3.2-10 Trip Rate Assumptions shows no recreational trips which does not consider sports and recreational focus.</li> <li>4. Section 3.2.4 Impact Analysis Identifies 10 Air Quality impacts of potential significance and</li> <li>5. Section 3.2.5 Mitigation measures – identifies mitigations for impacts.</li> <li>6. Section 3.2.6 Levels of Significance After Mitigation - all impacts even after mitigation are considered significant and unavoidable.</li> </ul>	 I9-13 Cont.
<ul style="list-style-type: none"> <li>• 3.3 Biological <ul style="list-style-type: none"> <li>1. Other jurisdictional requirements if met, along with any identified mitigations could result in less than significant impact.</li> <li>2. My concern is who hires the required Certified Biologist?</li> </ul> </li> </ul>	 I9-14
<ul style="list-style-type: none"> <li>• 3.7 Green House Gases <ul style="list-style-type: none"> <li>1. Section 3.7.3 Thresholds of Significance again recognizes that projects could have additional cumulative impacts.</li> <li>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.</li> </ul> </li> </ul>	 I9-15
<p>Section 4 Cumulative Effects</p> <p>All environmental impacts identified are significant if taken cumulative. Findings are significant and unavoidable in all areas except energy, population, public facilities, recreation, utilities and wildfire.</p>	 I9-16
<p>Section 5 Other CEQA considerations</p> <p>5.1.1 addresses Agriculture and farmland and while these lands are not currently identified as prime farmland they have been in the past and could be again if currently undeveloped, much of it having previously been agricultural farmland. The potential for reestablishing farmland and agriculture should have been explored further and supported in land use designations.</p>	 I9-17
<p>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.”</p>	 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 of 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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Direct Dial: 949.851.5484 File Number: 376839-00001/OC1255079

**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



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

I11-6

- **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~~



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



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.

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.)

I11-9

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  
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~~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).~~

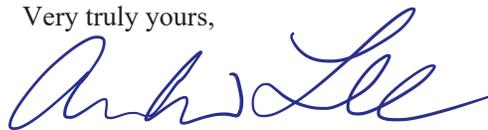
~~The change in use could potentially result in a significant impact to the setting of 3667 Placentia Lane (P-33-006973), if the property is reevaluated and found to be an historical resource under CEQA. Any future projects that affect Subarea 4 would require the reevaluation of this property. Thus, 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  
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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  
Jennifer O'Farrell, Ward 1  
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Andrew Wacker, Ward 5  
Jeanette Hernandez, Ward 6  
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3900 Main Street, 7th Floor  
Riverside, CA 92522

City of Riverside City Council  
Mike Gardner, Ward 1  
Andy Melendrez, Ward 2  
Mike Soubirous, Ward 3  
Chuck Conder, Ward 4  
Chris Mac Arthur, Ward 5  
Jim Perry, Ward 5  
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").

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As presently proposed, the Specific Plan would eliminate over **100 acres** of industrial zoning surrounding the Ab Brown Sports Complex in the Northside Neighborhood and rezone it to new residential, largely multi-family zoning. See Framework Plan; Land Use Plan; 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.

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- **Policy LU-70.** As mentioned above, this policy aims to create a "balanced community with sufficient office, commercial and *industrial uses* while preserving the *single family residential* preeminence of the community." 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).



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



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

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

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

The proposed Specific Plan would immediately cause multiple businesses along Main Street and Center Street, including Transition Properties, to become legally nonconforming uses under the City's Zoning Code. Under this 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.

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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

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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

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

Very truly yours,



Andrew Lee

AL: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  
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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 Wohlgermuth <pjdnw@yahoo.com>

---

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 Wohlgermuth, 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 liquifaction? 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 liquifaction 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  
(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>

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>

# **LATE COMMENT LETTERS**



**GREATER RIVERSIDE  
CHAMBERS OF COMMERCE**

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

Planning Commission: September 3, 2020  
Agenda Item 4

August 24, 2020

Chair Kirby  
Members of the City Planning Commission  
3900 Main Street  
Riverside, CA 92501

**RE: Northside Neighborhood & Pellissier Ranch Specific Plan Alternative - SUPPORT**

Dear Chair Kirby and Members of the City Planning Commission:

On behalf of the Greater Riverside Chambers of Commerce, representing over 1,370 local employers and 110,000 jobs in the Inland Southern California region, we request your SUPPORT of the Northside Neighborhood & Pellissier Ranch Specific Plan alternative with the recommendation that the City continue to work with Riverside Public Utilities regarding inclusion of energy distribution at Pellissier Ranch. The Chamber has remained actively engaged since 2015 in the City's community-based planning for the development of a viable and comprehensive land use specific plan for the largest designated specific plan in the City. Of the four alternatives evaluated, the Chamber's Hunter Park Board and Economic Development Council, comprised of key stakeholders, developers and business leaders voted in unanimous support of the Northside Neighborhood & Pellissier Ranch alternative for the Northside Specific Plan.

The Chamber convened key stakeholders to attend and provide feedback at community workshops as the framework was developed and continued to work closely with the City and Rick Engineering Company to provide feedback on the Draft Land Use Plan & Project Description in 2018 as well as the Draft Program Environmental Impact Report between March and April 2019. The Hunter Park Board engaged in the public scoping meetings in 2019 to provide additional insight and voiced support on the benefit of transition zone overlays to provide maximum flexibility and protection for property owner rights to set the City up for success in the future. The Chamber invited representatives from the City and Rick Engineering Company to provide ongoing updates to the Chamber from 2019-2020. The Chamber commends the work the City and Rick Engineering Company have done to champion public-private partnerships, and create a Draft Plan to help guide the Specific Plan Area (SPA) land use, mobility, and environmental decisions to improve the Northside's vitality and future growth.

This proposal will streamline the development process and plan for a mix of uses, resulting in a vibrant community, improved circulation and mobility options to protect the character and image of the Northside Neighborhood. The plan will champion the private sector, capitalizing on the many opportunities of the Northside Neighborhood that will result in quality of place, vibrant mixed-use districts, high quality parks and open spaces, and unique employment opportunities and more jobs in our region. For these reasons, the Chamber requests your SUPPORT for the Neighborhood & Pellissier Ranch alternative for the Northside Specific Plan. Thank you for your consideration.

Respectfully,

Cindy Roth  
President/CEO

CR/bb



Craig D. Miller  
General Manager

Steven K. Adams  
Division 1

Gracie Torres  
Division 2

Brenda Dennstedt  
Division 3

Donald D. Galleano  
Division 4

S.R. "Al" Lopez  
Division 5

Securing Your Water Supply

September 4, 2020

David Murray  
Principal Planner  
City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main Street  
Riverside, CA 92522

VIA EMAIL

**NOTICE OF PUBLIC HEARING & PUBLIC COMMENT - P19-0064 (GENERAL PLAN AMENDMENT); P19-0065 (SPECIFIC PLAN); P19-0063 (ZONING CODE AMENDMENT); P20-0443 (REZONING); P19-0066 (EIR)**

This letter is in response to your Initial Case transmittal dated August 7<sup>th</sup>, 2020.

Western Municipal Water District (Western) has no public comments on proposed items mentioned above as contained in the notice. Western does not provide retail water service within the following vicinity north of State Route 60 and Main Street in Downtown Riverside, south of Pellissier Ranch, west of Interstate 215 and east of the Santa Ana River. Our records further indicate that the City of Riverside and Riverside Highland Water Company are the water and/or sewer purveyor for this area.

Should you have any questions regarding this matter, please contact Development Services at (951) 571-7100.

THOMAS G. SCOTT, P.E.  
Principal Engineer

TGS:dsc

Attachments: Initial Case Transmittal

# Notice of Public Hearing

Community & Economic Development Department  
Planning Division  
City Hall  
3900 Main Street  
Riverside, CA 92501



City of Arts & Innovation

Priority Mail  
ComBasePrice



U.S. POSTAGE  
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ZIP 92501 \$000.46<sup>0</sup>  
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RECEIVED  
AUG 27 2020

You are invited to attend a virtual Public Hearing before the City of Riverside Planning Commission for the following project. View virtual meeting live webcast at [www.engageriverside.com](http://www.engageriverside.com):

**DATE OF NOTICE:** August 7, 2020

**VIRTUAL MEETING INFORMATION:** September 3, 2020, 9:00 a.m.

**APPLICANT:** City of Riverside

**PROJECT LOCATION:** Generally bounded by Pellissier Ranch (Colton) to the north, State Route 60 (SR-60) and portions of Main Street in Downtown Riverside to the south, Interstate 215 (I-215) and residences to the east, and the Santa Ana River to the west.

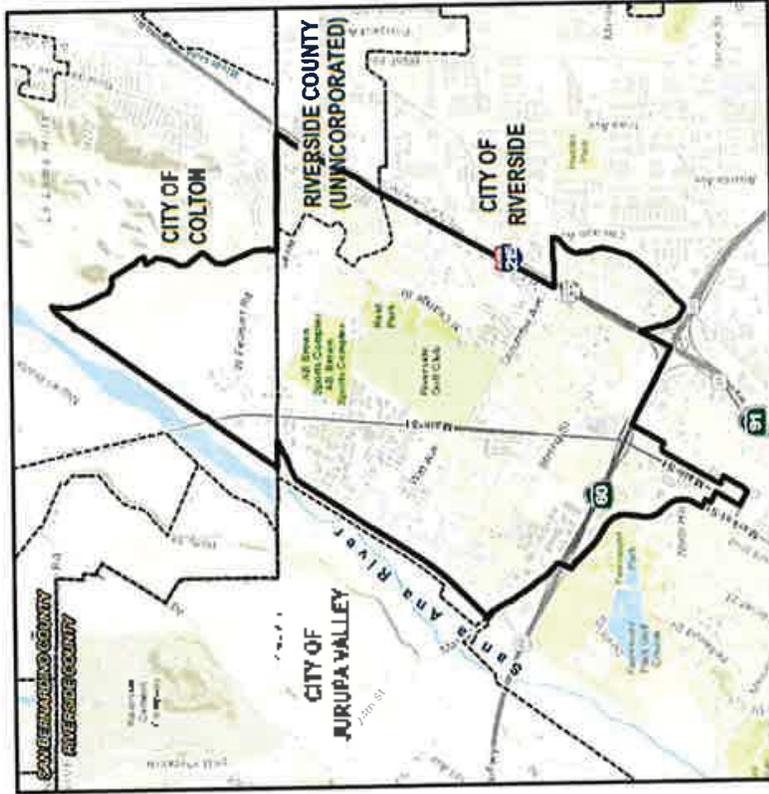
**CASE NUMBERS:** P19-0064 (General Plan Amendment), P19-0065 (Specific Plan), P19-0063 (Zoning Code Amendment), P20-0443 (Rezoning), P19-0066 (PEIR)

**CASE PLANNER:** David Murray, Principal Planner, (951) 826-5773 or [dmurray@riversideca.gov](mailto:dmurray@riversideca.gov)

Thomas Scott Principal Engineer  
Western Municipal Water District

14205 Meridian Parkway

Riverside, CA 92518



925180045 004

# Notice of Public Hearing

**PROPOSAL:** To consider the following items in conjunction with the proposed interjurisdictional Northside Neighborhood and Pellisier Ranch Specific Plan (NSP): **1) General Plan Amendment** to amend the Land Use and Urban Design Element of the General Plan to include the Northside Specific Plan into Table LU-2, amend Figure LU-9 – Neighborhoods to adjust neighborhood boundaries, amend Figure LU-10 – Land Use Policy Map to apply the NSP – Northside Specific Plan land use designation to the project area within the City of Riverside and the unincorporated properties within its Sphere of Influence, amend Table LU-5 – Zoning/General Plan Consistency Matrix, and amend Objectives, Policies for consistency with the NSP; **2) Specific Plan** to create the NSP and amend the Downtown Specific Plan to incorporate the North Main Street District into the NSP boundaries; **3) Zoning Code Amendment** to amend Title 19 (Zoning) of the Riverside Municipal Code to add Chapter 19.146 – Northside Specific Plan (NSP) and amend relevant information in Chapter 19.220; **4) Zoning Code Amendment** to rezone properties to the districts proposed in the NSP; and **5) Program Environmental Impact Report.**

City Hall is closed to the public due to the COVID-19 pandemic. Copies of the Draft Northside Specific Plan and Draft Program Environmental Impact Report can be viewed on the Northside Specific Plan project website: <http://northsideplan.com/>. The staff report will be available on August 21, 2020 on the City's webpage at <https://riversideca.legistar.com/Calendar.aspx>.

This notice is being mailed to agencies and individuals that have requested such notifications associated with this project. Public comments can be submitted by e-comments until 8:30 a.m., on September 3, 2020, at [www.engageriverside.com](http://www.engageriverside.com). Written comments mailed via USPS may be submitted for consideration or email comments to [dmurray@riversideca.gov](mailto:dmurray@riversideca.gov).

Interested parties may contact the Planner between 8:00 a.m. and 5:00 p.m. Monday through Friday: David Murray, Principal Planner, City of Riverside Community & Economic Development Department, Planning Division, 3900 Main Street Riverside, CA 92522 (951) 826-5773 or [dmurray@riversideca.gov](mailto:dmurray@riversideca.gov).

## Comment Letter I14

**From:** Linda Baker <[mamabaker51@gmail.com](mailto:mamabaker51@gmail.com)>

**Sent:** Monday, August 31, 2020 2:37:41 PM

**To:** Nicol, Colleen <[CNicol@riversideca.gov](mailto:CNicol@riversideca.gov)>; Perry, Jim <[JPerry@riversideca.gov](mailto:JPerry@riversideca.gov)>; Bailey, Rusty <[RBailey@riversideca.gov](mailto:RBailey@riversideca.gov)>; Melendrez, Andy <[ASMelendrez@riversideca.gov](mailto:ASMelendrez@riversideca.gov)>; Conder, Chuck <[CConder@riversideca.gov](mailto:CConder@riversideca.gov)>; Edwards, Erin <[EEwards@riversideca.gov](mailto:EEwards@riversideca.gov)>; Hemenway, Steve <[SHemenway@riversideca.gov](mailto:SHemenway@riversideca.gov)>; Plascencia, Gaby <[GPlascencia@riversideca.gov](mailto:GPlascencia@riversideca.gov)>; Fierro, Ronaldo <[RFierro@riversideca.gov](mailto:RFierro@riversideca.gov)>

**Cc:** Erin Snyder - RNP <[epolcene@juno.com](mailto:epolcene@juno.com)>

**Subject:** [External] Fwd: Northside Specific Plan

I am in complete agreement with Diana Ruiz on this issue. Linda Baker

Sent from my iPhone

Begin forwarded message:

**From:** Sharon Mateja <[smateja@earthlink.net](mailto:smateja@earthlink.net)>

**Date:** August 31, 2020 at 1:56:55 PM PDT

**To:** [fandrade@riversideca.gov](mailto:fandrade@riversideca.gov)

**Cc:** [cnicol@riversideca.gov](mailto:cnicol@riversideca.gov)

**Subject:** Northside Specific Plan

cc Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
DCM  
C&ED Director

Dear Frances Andrade,

Will you please distribute my following email to all of those on the Planning Commission?

Sharon Mateja

Dear Planning Commissioners,

I do not need to “recreate the wheel” in voicing my opinion regarding the Northside plan. I am in agreement with the letter below authored by Diana Ruiz, and the opinion letter that you have received from Wohlgemuth Family regarding the Northside plan. I support the residents of the Northside in asking for consideration to be made for their quality of life, heritage, and environmental issues....plus all other concerns mentioned by Ms. Ruiz and the Wohlgemuth Family.

I am hopeful with our new council, new ideas and values will help the northside residents achieve the community of their dreams.

Respectfully,

Dr. Sharon B Mateja

Chairperson RRR – Residents for Responsible Representation

Member of NBT

PS Colleen, please include this email in the public records

“ Dear Mr. Eastman:

Thank you for a comprehensive Northside Specific Plan that includes community input and addresses many aspects of sustainability, including complete streets, expanded urban forests, and restoring Springbrook Arroyo. A sustainable community also includes land uses that create resilience and food security, and the draft plan omits the opportunity for agriculture on some of the best remaining undeveloped soils in the city.

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.)

Grangeville fine sandy loam is a Class I-1, with the highest Capability Unit and would also rate as a prime soil. Although these soils are not required to be mitigated for because they are not on the State’s Important Farmlands map, they are an important planning consideration and a missed opportunity.

The city council adopted the “Food and Agriculture Policy Action Plan” in Spring of 2015 that includes the High Priority to preserve ag lands (page 27): “Develop an improved multi-faceted policy for long-term preservation of land most suitable for agriculture, including zoning, entitlement processes, and purchasing land that is at risk to keep or place it in agricultural production.” In this case, some of the land is already owned by the city, and the high quality soil resources should be evaluated for their potential best use.

From a community benefit and sustainability analysis I ask: Why is agriculture not a priority, as are other types of businesses? We would be much more resilient and prepared for health emergencies, earthquakes, and climate change if Riverside could feed its populace utilizing some of its highest quality 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”?

The Specific Plan does designate a very small area of erosive, marginal soil for a “buffer” of agriculture, instead of prioritizing the use of the higher quality agricultural soils that produce higher yields with less inputs and at lower costs.

I hope you will consider requiring a more in depth review of the soil resources, potential ag land uses, incentives to bring farm businesses, and opportunities for feeding our people as part of a more sustainable Northside Specific Plan and EIR.

Thank you for your hard work on an in depth and mostly successful plan.”

Diana

Protect yourself and those around you. Wear a face covering, stay home, and avoid gatherings with people outside your household. [RiversideCA.gov/COVID-19](https://www.RiversideCA.gov/COVID-19)

**Comment Letter A10**

**From:** Sharon Mateja <smateja@earthlink.net>  
**Sent:** Monday, August 31, 2020 1:57 PM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Cc:** Nicol, Colleen <CNicol@riversideca.gov>  
**Subject:** [External] Northside Specific Plan

Dear Frances Andrade,  
Will you please distribute my following email to all of those on the Planning Commission?  
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Respectfully,

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Member of NBT

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Thank you for your hard work on an in depth and mostly successful plan."

Diana

## Comment Letter I16

From: Martin McHugh <[bob7374@gmail.com](mailto:bob7374@gmail.com)>

Sent: Sunday, August 30, 2020 10:42 AM

To: Edwards, Erin <[EEwards@riversideca.gov](mailto:EEwards@riversideca.gov)>

Cc: Granillo, Donna <[DGranillo@riversideca.gov](mailto:DGranillo@riversideca.gov)>; Martin McHugh <[bob7374@gmail.com](mailto:bob7374@gmail.com)>

Subject: [External] Martin: Re: North Side Specific Plan. Septic Tank Hookups.

Hi Erin,

Regarding the North Side Improvement Specific Plan, I would once again respectfully suggest that all Northside properties that are on Septic Tanks, be connected to the main sewer lines "prior" to the start of any new construction or street work.

The septic tank hookups could be done street by street at minimal cost as part of the project cost.

At the very minimum, install and cap new mains sewer pipes onto each and every of the septic tank properties.

This would also play a large part in reducing the spread of future Pandemics.

(The London Bubonic plague makes interesting reading)?

My best regards to you all.

Martin

Sent from my iPhone

Protect yourself and those around you. Wear a face covering, stay home, and avoid gatherings with people

## **Aguilar-Crunk, Nancy**

---

**Subject:** FW: [External] Martin: Re: North Side Specific Plan. Septic Tank Hookups.

From: Martin McHugh <bob7374@gmail.com>

Sent: Sunday, August 30, 2020 10:42 AM

To: Edwards, Erin <EEdwards@riversideca.gov>

Cc: Granillo, Donna <DGranillo@riversideca.gov>; Martin McHugh <bob7374@gmail.com>

Subject: [External] Martin: Re: North Side Specific Plan. Septic Tank Hookups.

Hi Erin,

Regarding the North Side Improvement Specific Plan, I would once again respectfully suggest that all Northside properties that are on Septic Tanks, be connected to the main sewer lines “prior” to the start of any new construction or street work.

The septic tank hookups could be done street by street at minimal cost as part of the project cost.

At the very minimum, install and cap new mains sewer pipes onto each and every of the septic tank properties.

This would also play a large part in reducing the spread of future Pandemics.

(The London Bubonic plague makes interesting reading)?

My best regards to you all.

Martin

cc Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
DCM  
C&ED Director



City of Arts & Innovation

# Comment Letter I17

Public Comment for September 3, 2020  
 Planning Commission Meeting  
 Prepared by the Planning Division at 8:00 a.m. on September 3, 2020

Item	Name	Neighborhood	Position	Comments
<p>4. PLANNING CASES P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP), P19-0066 (PEIR), P20-0443 (RZ) Proposal by the City of Riverside to consider the following items in conjunction with the adoption of the interjurisdictional Northside Specific Plan: 1) General Plan Amendment to amend the Land Use and Urban Design Element of the General Plan to include the Northside Specific Plan into Table LU-2, amend Figure LU-9 - Neighborhoods to adjust neighborhood boundaries, amend Figure LU-10 - Land Use Policy Map to apply the NSP - Northside Specific Plan land use designation to the project area within the City of Riverside and the unincorporated properties within its Sphere of Influence, amend Table LU-5 - Zoning/General Plan Consistency Matrix, and amend Objectives, Policies for consistency with the NSP; 2) Specific Plan to create the NSP and amend the Downtown Specific Plan to incorporate the North Main Street District into the NSP boundaries; 3) Zoning Code Amendment to amend Title 19 (Zoning) of the Riverside Municipal Code to add Chapter 19.146 - Northside Specific Plan (NSP) and amend relevant information in Chapter 19.220; 4) Zoning Code Amendment to rezone properties to the districts proposed in the NSP; and 5) Program Environmental Impact Report. The Northside Specific Plan consists of approximately 2,000 acres within the City of Riverside, the City of Colton, and the unincorporated County of Riverside. It is generally bounded by Pellissier Ranch to the north, State Route 60 (SR-60) and portions of Main Street in Downtown Riverside to the south, Interstate 215 (I-215) and residences to the east, and the Santa Ana River to the west. Contact Planner: David Murray, Principal Planner, (951) 826-5773 <a href="mailto:dmurray@riversideca.gov">dmurray@riversideca.gov</a>.</p>	<p>Donatella Galella</p>			<p>I don't think that there should be any warehouses in the Northside plan.</p>



City of Arts & Innovation

**Public Comment for September 3, 2020**  
**Planning Commission Meeting**  
**Prepared by the Planning Division at 8:00 a.m. on September 3, 2020**

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City of Arts & Innovation

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City of Arts & Innovation

**Public Comment for September 3, 2020**  
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City of Arts & Innovation

**Public Comment for September 3, 2020**  
**Planning Commission Meeting**  
**Prepared by the Planning Division at 8:00 a.m. on September 3, 2020**

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## Comment Letter I18

**Murray, David**

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**From:** Jonathan Shardlow <Jonathan.Shardlow@GreshamSavage.com>  
**Sent:** Wednesday, August 26, 2020 10:52 AM  
**To:** Eastman, Jay; Murray, David  
**Cc:** Welch, David; Kopaskie-Brown, Mary; Brent McManigal  
**Subject:** RE: [External] Northside Specific Plan DEIR Comment Letter  
**Attachments:** Hamilton - Northside Specific Plan & DEIR Comment Letter.cleaned.pdf

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Jay and David,

Good afternoon. Will the Final EIR be available prior to the Planning Commission Hearing? Without being able to analyze the City's response to comments or the City's position on the Hamilton Trust's request to be included in the TZO (and to maintain their existing zoning), it is difficult to address the issue with the Planning Commission. The Hamilton Trust property is located in the small square where the proposed TZO ends and shares property lines of the TZO from the west and north of the property. No additional CEQA analysis would be needed to move the TZO over to complete the natural progression to Orange street as the TZO would maintain the status quo/baseline as the property is already zoned Business/Office Park. Please let me know City staff's position.

Jon



---

**From:** Jonathan Shardlow  
**Sent:** Tuesday, June 02, 2020 12:24 PM  
**To:** 'Eastman, Jay'; Brent McManigal; Nicol, Colleen  
**Cc:** Welch, David; Kopaskie-Brown, Mary  
**Subject:** RE: [External] Northside Specific Plan DEIR Comment Letter

Thank you Jay. I would note that the TZO was anticipated to be coupled with less restrictive design standards for industrial uses (compared to the current code) in order to ensure industrial uses do not over-improve their property and to incentivize a move to residential when and if the market would move that way. (i.e. the City wanted to have green-screen fences as opposed to block walls). I did not see any mention of such in either the Draft Northside Specific Plan or the Draft Programmatic Environmental Impact Report.

Jon

---

**From:** Eastman, Jay [<mailto:JEastman@riversideca.gov>]  
**Sent:** Tuesday, May 26, 2020 6:03 PM  
**To:** Brent McManigal; Nicol, Colleen

**Cc:** Welch, David; Jonathan Shardlow; Kopaskie-Brown, Mary  
**Subject:** RE: [External] Northside Specific Plan DEIR Comment Letter

Good Evening Brent,

Thank you very much for forwarding comments on the Draft Northside Specific Plan and its Draft Programmatic Environmental Impact Report (DPEIR).

This e-mail is to confirm that the City received the Mary Hamilton Trust comments, and the comment letter has been entered into the project record.

We appreciate your time and effort in reviewing the Northside Specific Plan and DPEIR.

Sincerely,

**Jay Eastman, AICP**  
Principal Planner  
City of Riverside  
Community & Economic Development Department  
Main: 951.826.5371  
Direct: 951.826.5264  
[JEastman@RiversideCA.gov](mailto:JEastman@RiversideCA.gov)

**From:** Brent McManigal <[Brent.McManigal@GreshamSavage.com](mailto:Brent.McManigal@GreshamSavage.com)>  
**Sent:** Tuesday, May 26, 2020 2:51 PM  
**To:** Eastman, Jay <[JEastman@riversideca.gov](mailto:JEastman@riversideca.gov)>; Nicol, Colleen <[CNicol@riversideca.gov](mailto:CNicol@riversideca.gov)>  
**Cc:** Welch, David <[DWelch@riversideca.gov](mailto:DWelch@riversideca.gov)>; Jonathan Shardlow <[Jonathan.Shardlow@GreshamSavage.com](mailto:Jonathan.Shardlow@GreshamSavage.com)>  
**Subject:** [External] Northside Specific Plan DEIR Comment Letter

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Mr. Eastman,

On behalf of the Mary Hamilton Trust, attached is our comment letter regarding the City's Northside Specific Plan DEIR.

Please confirm receipt of this email and letter.

Thank you,

Brent

---

Brent McManigal  
Shareholder

Gresham Savage Nolan & Tilden, PC  
550 East Hospitality Lane, Suite 300  
San Bernardino, CA 92408-4205  
Office: (909) 890-4499 Ext. 1807  
Fax: (909) 890-0687  
[www.GreshamSavage.com](http://www.GreshamSavage.com)  
[brent.mcmanigal@greshamsavage.com](mailto:brent.mcmanigal@greshamsavage.com)

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[Our Collective Mission: Ensure the well-being of residents, employees, and visitors in the City of Riverside by limiting the spread of COVID-19 and recovering in alignment with the Governor's orders. Response, RECOVERY, Thrive.](#)

---

Jonathan Shardlow  
Shareholder

Gresham Savage Nolan & Tilden, PC  
550 East Hospitality Lane, Suite 300  
San Bernardino, CA 92408  
Office: (909) 890-4499 Ext. 1770  
Fax: (909) 890-9877  
[www.GreshamSavage.com](http://www.GreshamSavage.com)  
[jonathan.shardlow@greshamsavage.com](mailto:jonathan.shardlow@greshamsavage.com)

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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.

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.

## **Background**

As the City is aware, this area has been utilized for industrial development for years and the demand for industrial uses remains strong. Pursuant to our Client's April 25, 2019 letter in response to the Notice of Preparation for the EIR, the Property has been actively pursued by industrial developers consistent with the demand in the area. The Northside area has been allowed to develop in a hodge-podge manner, and while the Specific Plan is an attempt to stop prior practices, it will only exasperate those past practices and further expand incompatible land uses.

### **The Northside Specific Plan Promotes Incompatible Land Uses.**

The City applied the Transitional Zoning Overlay (TZO) to adjacent properties. The TZO allows certain property to develop pursuant to the existing zoning code (i.e. industrial), even if that property is rezoned to residential. The Specific Plan, as proposed, will create inconsistent land use and is the epitome of bad planning. While there is no easy method to create an appropriate buffer zone between residential and commercial industrial uses, there are good planning methods that can be designed into projects that abut an incompatible land use. Due to the layout of the Property, industrial can be designed and developed with a buffer between the residential across Orange. The adoption of the Specific Plan with the TZO not applied to the Property will promote and allow industrial uses immediately adjacent to residential uses in direct conflict with each other. The Northside Specific Plan lack details and buffers necessary to prevent another "Sycamore Canyon" situation where industrial buildings are built close to and overpower the adjacent residential development. Good planning requires a single zone district on all properties within a block and incompatible zone districts to be separated by streets. The existing business park zone district along Orange Street, with Orange Street acting as the buffer, is good planning and should be allowed to remain.

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

### **Project Description**

The Draft EIR contains a fluid and confusing Project Description. The Project Description does not provide a clear concise description of the proposed zone changes, or design criteria of the Specific Plan. In addition, the analysis of sections of the DEIR, uses variations and sub-variations of the project description such that it is unclear what is being analyzed in each section. Specifically, the DEIR identifies the Property as being located within Subarea 7; however, there is no description or analysis that shows the loss of Business Park compared to the increase in housing units. The DEIR should clearly identify where and how the land uses are being changed and must analyze those changes will impact the environment. The Courts have confirmed that “an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185). The DEIR blurs the analysis such that the reader cannot determine what land uses are being studied and as a result, the analysis and DEIR is flawed.

### **Analysis of Transitional Zoning**

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

### **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).

### **The Baseline and Cumulative Projects are Inaccurate**

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

In addition, the City (as required by law), has identified certain property within the Northside Specific Plan area as surplus property, which if purchased by a state entity would allow that entity to build any use the entity desired to be built irrespective of the zoning, which again could result in incompatible uses. (*Regents of Univ. of California v. City of Santa Monica* (1978) 77 Cal.App.3d 130 holding that in view of the virtually plenary power state entities, state entities are exempt from local zoning regulations).

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

The City cannot simply disregard the existence of approved uses and uses which the State of California may build. Without this information, it is impossible to analyze the potential impacts of the Specific Plan.

### **Project Alternatives**

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

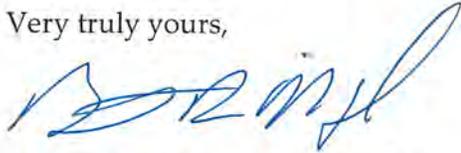
### **Recommendation**

Based on the following, we request the City revise the Northside Specific Plan to allow for the existing business/office zoning designations to remain and the City focus its efforts on supporting and promoting the growth of job-producing industries and appropriate residential development. The Northside Specific Plan should be a document that focuses on good urban design that utilizes site layout to create adequate buffers between the residential/industrial interface. At a minimum, we respectfully request the City adopt the 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.

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 "Brent R. McManigal". The signature is fluid and cursive, with the first name "Brent" being the most prominent.

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

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

September 2, 2020

David Murray  
Principal Planner  
Community & Economic Development Department  
Planning Division  
3900 Main Street  
Riverside, CA 92522

Dear Planning Commission,

My name is Erin Snyder and I've been a Northside resident for more than forty years. I've been involved in the community's efforts to create the neighborhood of our dreams for most of that time. I was part of the process creating the Northside Community Plan in 1991. I and many others worked very hard for the inclusion of the Northside Amendment to the General Plan 2025. One of the General Plan changes you are recommending today is to remove the section pertaining to the creation of a Northside Specific Plan. This proposed Northside Specific Plan does not meet the intent of the General Plan 2025 and actually represents a step backward of inclusion of the community's ideas and wishes. The GP2025 calls for the Northside Specific Plan to emphasize the retention of open space and recreational resources including the golf course or comparable open space and to consider alternative land uses to optimize compatibility with recreation. The proposed Northside Specific Plan does not go far enough to meet these goals.

I have previously submitted comment regarding the Northside Specific Plan and Draft Program Environmental Impact Report. I know those comments are included in your packets and I want to make sure they are considered a part of the record for this meeting.

Particularly I want to express my concern about the Transition overlay Zone imposed on the current business properties on North Main St. (north of the 60Fwy.) The presentation historical timeline neglected to include the Northside Redevelopment Zone, the last time zoning changes were imposed on this community. There are a number of long time Riverside businesses that were negatively impacted then when their commercial and retail zoning was changed to Industrial and Business Manufacturing Park. Some of them stuck around even though they could no longer grow their business the way they hoped and additionally had to pay conditional use permits due to non-zoning compatible uses. Now their zoning is impacted by this overlay zone that will further limit their future growth to high density residential. There are other areas in the NSP with multi-use or mixed use designations. There should be a zoning option that would allow flexibility for the current and long time businesses to develop in a way that meets their and the community's needs. The Village Center concept looks pretty but we know the reality is a grocery store won't come based on the current socio-economics. Additionally, the traffic impacts to Columbia Ave. an already dangerous overcrowded road is just not practical. Allowing the already developed properties to be utilized by businesses and services needed by the neighborhood makes more sense.

Another concern is the proposed Industrial Research park on the Pellisier Ranch land. We've seen this before. The end of Columbia Ave. at the Box Springs Mountains was approved based on the fact that it was going to be a state of the art industrial research park that could be used by UCR and would bring great innovative and technological business to the city. That didn't work, now it's Sandals Church. It doesn't make sense to follow a failed model. The publicly owned properties in the Northside Specific Plan were acquired and maintained for their natural resources. Those resources are just as important if not more so today. The soil and plants provide carbon sequestration even as they sit there empty. Water infiltration into the city's aquifers continues as long as the land is open and the ground not covered with impermeable surfaces. The benefits to the community are irreplaceable. Protection of the natural, cultural and historic resources has been emphasized by the community over and over again. This proposed plan is not the best to achieve those goals.

Specifically to the recommendations you are planning to make today. I and many others have already pointed out the problems with the Draft PEIR. Even with the mistakes, misrepresentations, inaccuracies, incomparability, and other inadequacies previously pointed out, the report could not deny that this plan would result in multiple significantly negative impacts that can't be reduced by mitigation and are therefore unavoidable. Basically it says the plan will really mess up your community but we don't care. It's important to note that this is an identified disadvantaged community. It is particularly an environmentally disadvantaged community. This proposed plan and PEIR are an example right here and now of social injustice and inequality. To knowingly and willingly subject this neighborhood to further negative environmental impacts is unconscionable.

This is especially concerning because recommendation B is not entirely accurate. The Springbrook Heritage Alliance submitted a Parklands and Walking Trails proposal. It is another example of neighbors attempting to envision their future. The Parklands proposal was accepted as part of the NSP process but was minimized as unprofessional and uncomprehensive and therefore not meeting the program objectives. The Northside Specific Plan process could have further developed the Parklands proposal with the professionals we paid 2 million dollars to. If you had given it to us or any kind of support to develop the idea or a city planner that we also pay for, it could have been much more professional development plan. Even so the NSP identifies the Parklands proposal as the least environmentally impactful. Therefore it could be adopted (certainly with further development) and thus many of those significantly negative impacts would be avoided. They are not unavoidable; if you approve this plan you condemn this neighborhood to further environmental and social injustice.

For all of these reasons I ask you not to make the finding that there are no viable alternatives (recommended finding b) and not to recommend approval of the Land Use changes, Zoning changes, Northside Specific Plan or the PEIR.

Sincerely,  
Erin Snyder  
1645 Mathews St.  
Riverside, CA 92507

cc Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
DCM  
C&ED Director

## Comment Letter I20

Planning Commission September 3, 2020  
Agenda Item: 4

**From:** Jim Wood <minwood2@earthlink.net>  
**Sent:** Thursday, September 03, 2020 8:09 AM  
**To:** Murray, David <DMurray@riversideca.gov>  
**Cc:** Andrade, Frances <FANDRADE@riversideca.gov>; Kopaskie-Brown, Mary <MKopaskie-Brown@riversideca.gov>; Karen Renfro <k.a.renfro7@gmail.com>; Welch, David <DWelch@riversideca.gov>; Springbrook Heritage Alliance <info@springbrookheritagealliance.org>; Peter Wohlgemuth <pjdnw@yahoo.com>; erin snyder <epolcene@juno.com>; Nancy Melendez <nancy.melendez@icloud.com>; Chris Hebert <chebert968@aol.com>; Irene Lozano <irenelo92501@yahoo.com>; johnkrick@charter.net; Marisa Yeager <marisayeager@gmail.com>; Henry James Vásquez <HJVsqzIMISA@sbcglobal.net>; Media-morrisz1 <morrisz1@aol.com>; Pat Stewart <patsiann@pacbell.net>; Barbara Wilson <pandbwils@charter.net>  
**Subject:** [External] SPRINGBROOK HERITAGE ALLIANCE TO RIVERSIDE PLANNING COMMISSION, AGENDA ITEM #4

Riverside Planning Commission  
City of Riverside  
3900 Main Street  
Riverside, California 92522

CC: Chairman and Members of the Riverside Planning Commission

INTERJURISDICTIONAL SPECIFIC PLAN FOR RIVERSIDE'S NORTHSIDE &  
COLTON'S PELLISSIER RANCH  
P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP) P19-0066 (PEIR), P20-0443  
(RZ)  
Agenda Item #4

Honorable Chairman and Members of the Riverside Planning Commission:

I enthusiastically reflect the wishes, goals, and ideals of Springbrook Heritage Alliance regarding the Northside of Riverside. As noted by Karen Renfro and many others, "it has long been our wish that the City of Riverside would adopt a Specific Plan for the Northside to reflect the wishes of the residents and businesses who have made this area their home. However, although the plan they have proposed contains a wide variety of land uses--old and new--it falls short of being a realistic approach to the business of improving the well-being of the people ".

"The Northside neighborhood is the City's oldest, with unique and remarkable history that deserves to be recognized and cherished."

"We hope you will include the *Parklands* proposal for a *Spanish Town Village Historical District* as part of the final Northside Specific Plan. And we thank you for your consideration of this request". Please refer to the attachments in the Renfro letter.

Respectfully yours,  
James Wood,  
3410 Chase rd, Riverside, CA 92501

## Comment Letter O10



September 2, 2020

Community & Economic Development Department  
Planning Division  
3900 Main Street  
Riverside, CA 92522

Principal Planner David Murray and Riverside Planning Commission,

I am writing on behalf of the Riverside Woman's Club, in support of the neighbors and businesses of the Northside, in the matter of PLANNING CASES P19-0064 (GPA), P19-0065 (SP), P19-0063 (AMD), P20-0443 (RZ), P19-0066 (PEIR), The Northside Specific Plan and Draft Program Environmental Report.

The community has been very involved in communicating their visions for the future development of their neighborhood for decades and generations. Riverside Woman's Club has been advocating for quality of life issues for just as long, throughout our city. Northside Improvement Association, Spanishtown Heritage Foundation, Reid Park Advisory Team and Old Spanish Trail Association are all community neighborhood groups in the Northside, supported over time and in various ways by the Riverside Woman's Club. We are additionally a member of Riverside Downtown Partnership and strong supporters of small businesses. We are writing in support of the neighbors and businesses of the Northside in the hope the proposed plan would be beneficial to the community.

We ask that you particularly pay attention to comments and issues raised by the people in the community most affected by this plan. The recommendations the commission is expecting to make do not appear to be beneficial to the community. Recommendation C clearly admits that there are many significant negative impacts that cannot be lessened much by mitigation. This situation is considered unavoidable, yet not approving this plan would avoid most of them. These negative impacts will be borne by this community in bad unhealthy air quality, traffic, noise issues and the many other problems

listed in the presentation. The city appears not to care, naming the impacts unavoidable. This community is already identified as environmentally and economically disadvantaged. It would be negligent of the city to further contribute to the decline of the community and neighborhood by implementation of a poor plan.

The Trujillo Adobe and the cultural and historical resources from the original community, older than the City or County of Riverside and the state of California in addition to the natural resources are of utmost importance and their conservation and preservation should be paramount. Recognition for the earliest people in this area and the heritage and history of all; from the indigenous peoples to the settlers from Abiquiu New Mexico to the farmers from many diverse backgrounds, including Japanese Americans interred during WWII, should be taken into consideration. Agricultural land still remains in the Northside and is becoming more and more critical to a sustainable future. All of these are concerns raised by the community through this ongoing process and yet the proposed plan does not seem to reflect the community's interests.

Recommendation B claims there is no alternative that meets project objectives. Riverside Woman's Club was one of the first groups to endorse the Springbrook Heritage Alliance Parklands and Walking Trails proposal. This is a foundational proposal created by the neighbors and neighborhood groups that could easily be developed into a plan that met project objectives. It also has the least environmental impact on the community. For all of these reasons and the many concerns previously brought up by neighbors and business we urge not accepting the proposed recommendations. Please listen to the neighbors, neighborhood groups and Northside businesses and respond in the best interests of the community.

Sincerely,

Marti Noyes, Co-President  
Riverside Woman's Club  
4092 10<sup>th</sup> St.  
Riverside, CA 92501

cc Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
DCM  
C&ED Director

**Comment Letter O11**

**ROQUET FAMILY, LLC**

a California limited liability company

c/o Terri Roquet, 30247 Marianne Lane, Highland, CA 92346

Telephone: (951) 453-2844 e-mail: [Terriroquet@yahoo.com](mailto:Terriroquet@yahoo.com)

**September 2, 2020**

**Via E-mail Transmission to: dbkirby@att.net; dmurray@riversideca.gov**

Richard Kirby, Chairman  
Riverside City Planning Commission

Re: September 3, 2020, Planning Commission Agenda Item #4 – Northside Specific Plan

Dear Mr. Kirby:

Roquet Family, LLC is the owner of land in the City of Colton currently being processed for, and under option for, development by Sunmeadows, LLC.

Roquet Family, LLC, concurs in its opposition to the draft Northside Specific Plan and related planning and zoning documents (collectively, the “NSP”) for all of the reasons set forth in the letter from Sunmeadows, LLC to you dated September 1, 2020, a copy of which is attached hereto, including, but not limited to, the negative environmental impacts related to traffic, air quality, greenhouse gas emissions, noise and public safety that would result from the proposed elimination of the Orange Street Extension as called for in the current draft of the NSP.

Sincerely,

Roquet Family, LLC

*Terri Roquet*

Terri Roquet, Member

cc: David Murray, Principal Planner, via e-mail to [dmurray@riversideca.gov](mailto:dmurray@riversideca.gov)

William Lo via e-mail to [bl@billoconsulting.com](mailto:bl@billoconsulting.com)

James R. Pickett via e-mail to [jmspickett@gmail.com](mailto:jmspickett@gmail.com)

Mike Roquet via e-mail to [mjroquet@yahoo.com](mailto:mjroquet@yahoo.com)

Joe Roquet via e-mail to [roquetconstruction@gmail.com](mailto:roquetconstruction@gmail.com)

Stephen Roquet via e-mail to [stephenroquet@hotmail.com](mailto:stephenroquet@hotmail.com)

Mary Ann Cowell via e-mail to [macscottage@yahoo.com](mailto:macscottage@yahoo.com)

AC Nejedly via e-mail to [sjnejedly@aol.com](mailto:sjnejedly@aol.com)

Ernest O. Vincent via e-mail to [eovincent1@hotmail.com](mailto:eovincent1@hotmail.com)

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

September 1, 2020

Mr. Richard Kirby, Chairman, Riverside City Planning Commission  
CC David Murray, Principal Planner

Via Email

Subject: Planning Commission Agenda Item #4 – September Draft Northside Specific Plan EIR and Northside Specific Plan Documents

Dear Chairperson Kirby:

Sunmeadows, LLC. is opposed to the draft Northside Specific Plan with its' current design, which would eliminate the of extension of Orange Street from West Center Street to Pellesier Road, a road segment which is a key component of the approved Roquet Ranch Specific Plan in the City of Colton. Additionally, our May 21-2020 DEIR Comment Letters (DEIR Comment Letters O-7 and O-8, attached) identified what we believe are deficiencies in the analysis within the Draft EIR related to traffic, air quality, Greenhouse Gas emissions, noise and public safety, stemming from the proposed elimination of the Orange Street Extension.

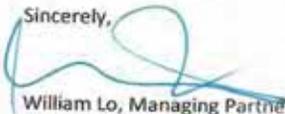
Sunmeadows, LLC. is the developer of the adopted Roquet Ranch Specific Plan located adjacent to the Pellessier Ranch portion of the proposed Project within the City of Colton. We have substantial concerns with the content of the proposed Specific Plan and with the analysis contained in the Draft EIR related to the closure of Orange Street, north of West Central Avenue ("Orange Street Extension").

Unfortunately, the documents provided to the public for the Planning Commission Hearing on September 3, 2020 do not include a revised/updated Specific Plan document demonstrating the design/phasing changes we suggested, nor is the Response to Comment section of the EIR provided. Therefore, we are unable to determine if any changes have been made to the Project Description, the DEIR analysis or the Specific Plan design.

An environmentally superior Project could be adopted which would cure a majority of the 12 deficiencies identified in our May 22 comment letters, if the proposed Project (or any of the alternatives identified in the DPEIR) was modified to include language which preserves the Orange Street Extension or which required the construction of the full segment of Pellissier Road within the Project, prior to the elimination of the "Orange Street Extension", from West Center Street to Pellissier Road.

Therefore, we respectfully recommend the City of Riverside Planning Commission that they deny Staff's Recommendation as contained in the Staff Report, and instead recommend to the City Council that the Project be modified to preserve the "Orange Street Extension" or be modified to preserve the Orange Street Extension until such time as the segment of Pellissier Road within the Project boundaries is constructed to a minimum width acceptable to the Colton Fire Department for use as secondary access to the Roquet Ranch Specific Plan.

Sincerely,



William Lo, Managing Partner, Sunmeadows, LLC

**From:** Terri Roquet <terriroquet@yahoo.com>  
**Sent:** Wednesday, September 02, 2020 2:58 PM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] 9/3/20 planning commission hearing Item 4

Terri Roquet Tate, Member of Roquet Family, LLC, concurs in the opposition to the draft Northside Specific Plan and related planning and zoning documents (collectively, the “NSP”) for all of the reasons set forth in the letter from Sunmeadows, LLC to Richard Kirby dated September 1, 2020, including, but not limited to, the negative environmental impacts related to traffic, air quality, greenhouse gas emissions, noise and public safety that would result from the proposed elimination of the Orange Street Extension as called for in the current draft of the NSP.

Thank you,  
Terri

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## The City of Riverside, CA

### Meeting: Planning Commission - Virtual Meeting

Meeting Time: September 03, 2020 at 9:00am PDT

#### Disclaimer:

Are you interested in making your opinion known? This new service brought to you by our agency gives you the opportunity to indicate whether you support or oppose measures being considered by your representatives. All details and comments provided will be entered into the public record. Inappropriate or offensive comments may be edited or deleted.

#### Agenda Item

**4. PLANNING CASES P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP), P19-0066 (PEIR), P20-0443 (RZ) Proposal by the City of Riverside to consider the following items in conjunction with the adoption of the interjurisdictional Northside Specific Plan: 1) General Plan Amendment to amend the Land Use and Urban Design Element of the General Plan to include the Northside Specific Plan into Table LU-2, amend Figure LU-9 - Neighborhoods to adjust neighborhood boundaries, amend Figure LU-10 - Land Use Policy Map to apply the NSP - Northside Specific Plan land use designation to the project area within the City of Riverside and the unincorporated properties within its Sphere of Influence, amend Table LU-5 - Zoning/General Plan Consistency Matrix, and amend Objectives, Policies for consistency with the NSP; 2) Specific Plan to create the NSP and amend the Downtown Specific Plan to incorporate the North Main Street District into the NSP boundaries; 3) Zoning Code Amendment to amend Title 19 (Zoning) of the Riverside Municipal Code to add Chapter 19.146 - Northside Specific Plan (NSP) and amend relevant information in Chapter 19.220; 4) Zoning Code Amendment to rezone properties to the districts proposed in the NSP; and 5) Program Environmental Impact Report. The Northside Specific Plan consists of approximately 2,000 acres within the City of Riverside, the City of Colton, and the unincorporated County of Riverside. It is generally bounded by Pellissier Ranch to the north, State Route 60 (SR-60) and portions of Main Street in Downtown Riverside to the south, Interstate 215 (I-215) and residences to the east, and the Santa Ana River to the west. Contact Planner: David Murray, Principal Planner, (951) 826-5773 dmurray@riversideca.gov.**

## Your Comment



[Ernest Vincent](#) at September 02, 2020 at 2:11pm PDT

Oppose

Ernest O. Vincent, attorney for Roquet Family, LLC, (neighboring landowner in City of Colton) submits the concurrence of Roquet Family, LLC in its opposition to the draft Northside Specific Plan and related planning and zoning documents (collectively, the “NSP”) for all of the reasons set forth in the letter from Sunmeadows, LLC to Richard Kirby dated September 1, 2020, a copy of which is attached hereto, including, but not limited to, the negative environmental impacts related to traffic, air quality, greenhouse gas emissions, noise and public safety that would result from the proposed elimination of the Orange Street Extension as called for in the current draft of the NSP.

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## Comment Letter O12

Dawna Marshall

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**Subject:** FW: [External] SPRINGBROOK HERITAGE ALLIANCE TO RIVERSIDE PLANNING COMMISSION SEPT. 3, 2020 AGENDA ITEM #4

**From:** Karen Renfro <[k.a.renfro7@gmail.com](mailto:k.a.renfro7@gmail.com)>

**Sent:** Wednesday, September 2, 2020 6:10 PM

**To:** Murray, David <[DMurray@riversideca.gov](mailto:DMurray@riversideca.gov)>; Andrade, Frances <[FANDRADE@riversideca.gov](mailto:FANDRADE@riversideca.gov)>; Kopaskie-Brown, Mary <[MKopaskie-Brown@riversideca.gov](mailto:MKopaskie-Brown@riversideca.gov)>; Welch, David <[DWelch@riversideca.gov](mailto:DWelch@riversideca.gov)>

**Cc:** Springbrook Heritage Alliance <[info@springbrookheritagealliance.org](mailto:info@springbrookheritagealliance.org)>; Peter Wohlgemuth <[pjdnw@yahoo.com](mailto:pjdnw@yahoo.com)>; erin snyder <[epolcene@juno.com](mailto:epolcene@juno.com)>; Jim Wood <[minwood2@earthlink.net](mailto:minwood2@earthlink.net)>; Nancy Melendez <[nancy.melendez@icloud.com](mailto:nancy.melendez@icloud.com)>; Chris Hebert <[chebert968@aol.com](mailto:chebert968@aol.com)>; Irene Lozano <[irenelo92501@yahoo.com](mailto:irenelo92501@yahoo.com)>; [johnkrick@charter.net](mailto:johnkrick@charter.net); Marisa Yeager <[marisayeager@gmail.com](mailto:marisayeager@gmail.com)>; Media-morrisz1 <[morrisz1@aol.com](mailto:morrisz1@aol.com)>; Pat Stewart <[patsiann@pacbell.net](mailto:patsiann@pacbell.net)>; [richard7austin@gmail.com](mailto:richard7austin@gmail.com) Austin <[richard7austin@gmail.com](mailto:richard7austin@gmail.com)>; Barbara Wilson <[pandbwils@charter.net](mailto:pandbwils@charter.net)>

**Subject:** [External] SPRINGBROOK HERITAGE ALLIANCE TO RIVERSIDE PLANNING COMMISSION SEPT. 3, 2020 AGENDA ITEM #4

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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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## Springbrook Heritage Alliance

*Saving the treasures of the Springbrook Arroyo Watershed communities*  
RIVERSIDE - COLTON - HIGHGROVE - GRAND TERRACE

Sept. 1, 2020

Riverside Planning Commission

City of Riverside

3900 Main Street

Riverside, California 92522

CC: Chairman and Members of the Riverside Planning Commission

INTERJURISDICTIONAL SPECIFIC PLAN FOR RIVERSIDE'S NORTHSIDE & COLTON'S PELLISSIER RANCH

P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP) P19-0066 (PEIR), P20-0443 (RZ)

Agenda Item #4

Honorable Chairman and Members of the Riverside Planning Commission:

Springbrook Heritage Alliance appreciates this opportunity to offer our comments on the actions before you relating to the adoption of the Northside Specific Plan & PEIR as presented by the Northside Specific Plan Team.

It has long been our wish that the City of Riverside would adopt a Specific Plan for the Northside to reflect the wishes of the residents and businesses who have made this area their home. However, although the plan they have proposed contains a wide variety of land uses--old and new--it falls short of being a realistic approach to the business of improving the well-being of the people who have invested their whole lives in this neighborhood in a way that serves their needs in particular of the surrounding communities in general.

We think there is a better way.

#### **RIVERSIDE'S FORGOTTEN LEGACY:**

The Northside neighborhood is the City's oldest, with unique and remarkable history that deserves to be recognized and cherished. We have identified many of them on our *Map of the Springbrook Arroyo & Environs* and *Heritage of the Springbrook Arroyo & Environs* which are attached below.

In 2014, SHA members adopted our *Springbrook Heritage Parklands & Walking Trails* plan to save the natural, cultural and historical treasures of the Springbrook Arroyo communities of Riverside, Colton, Highgrove and Grand Terrace. To achieve this, we propose the establishment of a Spanish Town Village Historical District, a mechanism for protecting, restoring, and developing these irreplaceable treasures in the area bounded by Columbia Avenue, West La Cadena Drive, La Loma Hills & Pellissier Ranch, and the Santa Ana River levee; restoration of Springbrook Arroyo along its entire course wherever possible; dedication of public recreational and open space facilities as permanent parklands, including the former Springbrook Golf Club (now the Championship CIF Cross Country Course), Ab Brown Sports Complex, Reid Park, and Pellissier Ranch.

See Joyce Carter Vickery's *Defending Eden: New Mexican Pioneers in Southern California 1830-1890* (UCR History Department & Riverside Municipal Museum, 1977).

#### **ECONOMIC CONSIDERATIONS OF LAND USE:**

Our proposal does not require an outlay of public funds from local municipalities. The preservation of the public facilities could be achieved through grants from public and private foundations, and the Spanish Town Village District private-sector marketplace venues through investment by small-scale entrepreneurs. This could result in an economic renaissance

for the Northside, based entirely on land use policy honoring the neighborhood's heritage. Besides new jobs and opportunities this would inspire, the new businesses would generate additional tax revenue from diverse sources--a much better proposition than putting all the new land uses into the basket of expensive large-scale projects. Our proposal is supported by local organizations and individuals.

When the City undertook to develop a Specific Plan for the Northside, we supported their efforts. We asked that our Parklands proposal be considered as an alternative to the other proposals for land use on the Northside. It has been so considered, and even though we are pleased it passed muster with the Environmental standards of CEQA, we are not so pleased to see that the Northside Specific Plan Team apparently did not read or understand our proposal, which clearly states our economic objective and how we propose to go about carrying it out.

Please see our *Map, Outline, and Petition* attached below.

#### **LAND USE ON THE NORTHSIDE:**

Now, we understand that Riverside has long considered the City's oldest neighborhood, whose cultural history precedes the founding of Riverside by perhaps a thousand years, as wasteland best suited for industrial and commercial development. For about 800 years it served as hunting, fishing and foraging land, site for sacred ceremonies, and occasional occupation during very dry periods. For 145 years it was agricultural, rural agricultural, and rural residential. In 1969 the Santa Ana River Levee was constructed with the assurance the Northside was protected from periodic flooding from the river. However, the flooding does not protect the Northside from rainfall run-off which has nowhere to go but the levee. That is why this area was so good for agriculture. But, the new residential zoning on the west-side of Main, and all the commercial and industrial zoning below Orange established by the Redevelopment Agency in 1990 is subject to periodic flooding. Nobody has been able to figure out how to mitigate this problem. The Redevelopment Agency was shut down in 2011 but the inappropriate zoning remains. In addition, the floodplain below Orange soils are subject to liquefaction and subsidence under certain conditions which occur at unpredictable intervals. It has happened before and it can happen again.

The close proximity of industrial and commercial to long-established single-family residential, public recreational and youth sports, small businesses and the historic Trujillo Adobe (ca. 1862)--now a City Landmark with historical designations from the County of Riverside and State of California--created land use conflicts that cannot be resolved if the City was not determined to turn this part of the Northside into an industrial/commercial center. Northside residents have opposed these changes all along--in fact the Northside Improvement Association (formed in 1912) has been fighting to bring in city amenities like sewers and sidewalks while keeping industrial and commercial out of their neighborhood for more than 100 years. There is no mitigation for the destruction of a neighborhood's character and heritage.

These sentiments are reflected in the Northside Plan of 1991 and the Riverside General Plan's guidelines for the Northside. Our *Parklands* proposal is consistent with the findings of these two documents, and despite the claim that it would not stimulate the neighborhood economy or

generate new tax revenue for the cities of Riverside and Colton, that is one of the intentions of our proposal.

Most importantly, despite current sentiment among developers and public officials, property taxes are neither the best way nor the only way to generate lots of tax revenue for the local treasury. Our *Parklands* proposal shows how to do this by letting loose the energy of individuals and small investors to develop operations that generate new tax revenue from a multiplicity of sources--in the long run a much more stable economy and much more beneficial to the neighborhood, and the City. According to a 2012 government report, the three most common impacts of historical preservation are increases in property values, job creation, and tourism. See "The Impact of Historical Preservation and Endowment" by Mimi Morris, Executive Officer of California's Cultural and Historic Endowment.

See also California's Office of Historical Preservation.

### **ISSUES REGARDING THE NORTHSIDE SPECIFIC PLAN PROCESS:**

It would be good if you understood how frustrating this has been for the people of the Northside to participate in the NSP process.

First, the NSP Team did not notify all the property owners in the study area by mail even though a change to land use policy is serious business. They said it would cost too much money and expected local residents and business owners to spread the word, forgetting that we are volunteers, not getting paid for all the extra work & expense involved, and have other more pressing obligations to fulfill. Turn-around times were scheduled for the convenience of the NSP Team, There was a succession of community sessions and workshops that were held in the Northside, and never were all the people who needed to know notified of these events. Local groups, including Northside Improvement Association, Spanish Town Heritage Foundation, OSTA-Agua Mansa Chapter, and SHA did the best we could, but turnouts were low. This was interpreted to mean lack of interest. Nothing could be further from the truth.

Second, when the Northside Specific Plan Team began meeting with local residents they said our discussions would start from a blank slate. They were not going to use the Northside Community Plan or General Plan's Northside Guidelines. Recently, we learned that the Northside Specific Plan Team was informed by city officials that they wanted a plan that would benefit our City's water supplies and generate property tax revenue for the public treasury.

This seems to explain why, despite the pleas of Northside residents, visiting sports enthusiasts, fans of the Trujillo Adobe, and local history buffs, the NSP calls for expensive, radical and unnecessary changes to the Springbrook Arroyo area below Orange Street. The NSP offers several alternatives for the Arroyo involving re-routing the Arroyo from its existing course (an enormously expensive project), and new commercial and industrial zoning in close proximity to La Loma Hills, the Trujillo Adobe, existing single-family residential, new single-family residential, youth sports and public recreational facilities.

Third, the worst of these proposes to separate the Arroyo at West La Cadena and re-route the waterway by connecting it to the Highgrove Channel a half-mile away across Center Street and the County line and use recycled water to keep it flowing year-round. This alternative does not explain what happens to the water in the upper Arroyo above the proposed

cut. It would also be prohibitively expensive and intrusive. Most of all, it is totally unnecessary. If the City dedicated the former golf course as a permanent local native arboretum & botanical garden-cross country course-public parkland, the three little ponds could be enlarged to make one lake that would sequester run-off water, help replenish underground water supplies, attract wild waterfowl, provide sustenance for local birds, and turn the park into a little paradise. The work involved could be done by volunteers under the supervision of the City staff. This suggestion is part of our *Parklands* proposal.

Fourth, the final proposal, consisting of many components and several alternatives, is not one that was presented in a community session, and we never saw some of the components until the document was released with the final PEIR. Even more frustrating, we never saw the proposed zoning maps until the agenda item for this hearing was posted twelve days ago and some of us didn't see them until late last week or early this week.

So there is much that is new to us, and we have not had sufficient time to study it as well as we'd have liked. And now we understand that if we do not bring up every point of concern to us at this meeting, we cannot bring it up before the City Council. The lack of transparency regarding this hearing means that the Northside Specific Plan is not a neighborhood plan at all. It is being imposed on us by city officials, professional consultants from out of town and special interests who wish to make a profit on our misery. All the property owners, residents and businesses have still not been notified about the NSP or this hearing. And because of the COVID restrictions our grassroots grapevine was unable to pick up the slack.

#### **LAND USE PLANNING:**

We believe that all property owners and their tenants have an equality of rights, and no one has a right to cause harm to their neighbors. However a site is zoned, new development should always be beneficial to the neighbors and the neighborhood--and they are the ones who should determine this. Title 19 and Title 19 both make this clear in the introductions.

We question the obvious assumption of city officials and urban planners that job creation is dependent upon noisy operations.

We question the wisdom of building high-density housing adjacent to the NSP's proposed Central Park. While it would provide open space to the high-density residents, we can see it becoming an attractive nuisance for the fringe population and homeless after hours.

We question the wisdom of building high-density housing on commercial streets or streets designated as truck routes, or areas in the flood plain below Orange Street.

We question the wisdom of building new high-density housing in an older single-family neighborhood that is eligible for designation as a historical district.

We question designating truck routes through existing residential neighborhoods, or neighborhoods with mixed-use residential, retail, restaurant, and small-scale commercial, or neighborhoods with sensitive historical landmarks.

We question whether uses not identified in the NSP Tables are allowed.

We recommend that new single-family and senior housing be developed on vacant land above Orange Street within existing residential zones.

See William Cowan's "The Trujillo Adobe and Warehousing of Southern California's Inland Empire" (Huntington-USC Institute of California and the West):

<https://iceblog.wordpress.com>

### **AESTHETICS & AIR QUALITY:**

The charm of the Northside is its rural character in an urban setting. Right now, some of the properties look a little ragged, but this is not a sign of blight so much as a sign of the instability of land use in the Northside. If the City goes with the NSP as proposed, allowing high-density housing and large-scale commercial and industrial will cause the Northside to become unlivable for those who already live and work here, the neighborhood will deteriorate accordingly. The aesthetics of new development on neighborhood livability affects Air Quality and other Quality of Life issues. And Air Quality suffers in direct proportion from a neglect of the aesthetic factors of land use. The Northside already has bad air quality, there is no need to make it worse. We do not have to live with heavy truck traffic, noxious chemicals or destruction of natural open spaces to improve the neighborhood's economy. The *Springbrook Heritage Parklands & Walking Trails* proposal shows how to do it.

The NSP-PEIR Air Quality findings are not consistent, or even very useful to an analysis of the NSP. Ambient Air Quality Standards are not comparable or helpful. Trip Rate Assumptions do not include existing or proposed sports or recreational uses. Findings of Negative Impacts are Significant, yet Mitigations cite levels after correction as still Significant and Unavoidable. Yet, the same document shows our *Parklands* proposal not only has no negative impacts to aesthetics and air quality, but is likely to improve both.

### **GEOLOGY/SOILS:**

There is no legitimate reason to propose any type of housing or intense urban or industrial development in the Santa Ana River floodplain or the tableland above Orange Street to the east. The bottomland is unstable, subject to flooding from rainfall run-off and subsidence as we mentioned above. The Riverside General Plan 2025 shows it is high-risk for liquefaction. Liquefaction can occur without rain or seismic activity, but is much less likely. The NSP PEIR admits this is so.

There are earthquake faults nearby at the top of Pigeon Pass and Reche Canyon, and fracture zones all over the area. According to recent examinations by flood control officials, the Santa Ana River levee is probably not capable of handling a 100-year flood. It is now known that the great Agua Mansa Flood of 1862, which washed the villages of Agua Mansa and La Placita de los Trujillos away (thankfully, no lives were lost), was of greater magnitude than that. The tableland is now almost entirely developed with single-family residential because until the Redevelopment Agency rezoned the Northside few people were foolhardy to build housing below Orange Street.

The danger of subsidence increases with higher rainfall and seismic activity. With seismic activity or even the constant weight of any superstructure, the soils could deform and compromise the structural integrity of the building. Given this knowledge, wouldn't the City be liable for allowing any development on these suspect soil types? Stabilizing gels are mentioned in passing as a potential mitigation, but there is no supporting text about projects that have successfully used it in the United States or in situations comparable to the Northside.

We have questions about this gel: How do we know they work? What are they made of? What are the side-effects we need to know about? Are they hazardous to human, animals, plants, soils, water supplies? Much more information is needed to evaluate the potential use of these gels. Alternatively, perhaps the best use of the lain underlain by these unstable soils is open space and rainwater sequestering from trees and vegetation, as proposed in our *Parklands* plan.

### **HYDROLOGY/WATER QUALITY:**

As long-time residents of the Northside, we have seen flooding from rainfall run-off submerge the intersections of Main & Placentia, Center & Placentia, Main & Columbia, Main & Strong, Market Street, many side streets along the levee, and so forth too many times to count. One of our members recalls seeing floodwaters rise all the way to Orange Street three times since 1969, the year the Santa Ana River levee was built, and these were not even close to being 100-year floods. This flooding occurs even during drought years.

The elevation at Main & Placentia is 830-ft., at Main & Columbia 825-ft, at Main & Strong 800-ft. The new housing down below Main Street experiences flooding often enough nobody who lives there is surprised anymore, but the question we have to ask is why did the City of Riverside allow residential development there at all? The answer is because FEMA doesn't look at rainfall run-off--just at how much a dam or a levee can bear. And in January 2013 the US Army Corps of Engineers issued a report about that section of the Santa Ana River Levee that rated its condition "unacceptable". We do not know if the damage has been repaired or the levee is being properly maintained since then. See below for the report.

According to the NSP Hydrology & Water Quality Section, most of the NSP Study Area is located in the 100-year flood plain of both the Highgrove Channel and Springbrook Arroyo. Potential fixes are proposed for re-constructing the Highgrove Channel to avoid a flood scenario, but except for channel widening, not for the Arroyo. This means much of the Northside will be awash in the event of a 100-year flood. The map on page 517 of the PEIR suggests the extent of the problem. We have questions about this: How could the City authorize development on these lands knowing disaster, though unpredictable as to timing, is inevitable. There is not enough money in the City treasury to cover lawsuits caused by this flooding, flooding that will only be made worse by new impervious surfaces created by proposed NSP development. It seems incredible the City would put itself in this position.

We suppose there are engineering solutions to overcome this problem--all of them expensive. Even so, they should be explored before this NSP and PEIR are finalized and adopted. Again, the best solution may be simple: more open space as we propose in our *Parklands* plan attached below. See *U.S. Army Corps of Engineers--Los Angeles District Report on Periodic Inspection of Santa Ana River at Riverside Upper 2, Jan. 18, 2013.*

### **TRANSPORTATION:**

We are concerned with the continued use of the Northside neighborhood for pass-through heavy truck traffic that is merely seeking convenient freeway access. On the one hand, it is great to know that Main, Center and Columbia have been named as "Complete Streets" with all the enhancements that accompany that designation. However, if these improvements only attract even more truck traffic, how does that benefit the local residents and shoppers who have to dodge these trucks? The Northside would be well-served with additional service by the RTA, but the big busses are not the best way to do this. The smaller, little red trolley-style busses would be a better fit, and offer more flexibility for the times and routes throughout the day, the week and the year. Service needs

to start very early and run very late to allow people to get to work or school and home again. Until that is possible, which may be never, people will have to use their own private vehicles to get around. This should be taken into account to avoid unnecessary inconveniences to the residents and businesses of the Northside.

Pedestrian crosswalks at intersections, whether there is a Stop sign or Traffic Signal, should be required. The lines form a box which forces motorists to come to a stop before they get to the edge of the intersection, which is an additional safety measure for pedestrians and motorists, as drivers often have a hard time seeing pedestrians, especially at night, in time to slow down or stop. Any changes to existing streets should be done in a sequence that will not cause trouble with traffic flow. Make sure if additional traffic is being directed somewhere, the streets receiving the new vehicles are prepared to deal with it.

### **CUMULATIVE IMPACTS:**

All environmental impacts identified in the NSP-PEIR are significant if taken cumulatively. These should include existing and proposed warehouses and massive logistics centers in Riverside, Moreno Valley, Bloomington, Fontana and elsewhere in the region. They should all be considered separately and together in relation to their negative effects on Quality of Life for the people of the Northside.

The NSP proposes many square feet of new commercial, industrial and research park projects without making a realistic assessment of the effects of this type of development on the people and the neighborhood, or surrounding communities.

The NSP, essentially, is a blueprint for adopting a "Growth at Any Cost" land use policy. Alternatively, the Cumulative Effects of our *Parklands* proposal are all beneficial and would be undertaken at a moderate pace that people could adjust to without undue stress.

### **CONCLUSION:**

We hope you will include our *Parklands* proposal for a *Spanish Town Village Historical District* as part of the final Northside Specific Plan. And we thank you for your consideration of our request. Please refer to the attachments below

### **FINAL REMARKS:**

We also hope you will look into the Northside Specific Plan adoption process for clarification about what comes next because what is happening now is not what we were told would be happening, and we are not sure of what is supposed to be happening. Our Due Process rights are at stake, so we didn't think this should be overlooked. Thank you for your kind attention to our concerns.

Respectfully yours,  
Karen Renfro, Chair & Spokesman  
Springbrook Heritage Alliance  
3064 Lime Street  
Riverside, California 92501\*

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Pete Wohlgemuth, Vice-Chair  
686 Forest Park Road  
Riverside, California 92501\*

Erin Snyder, Treasurer and Acting Secretary  
1645 Mathews Street  
Riverside, California 92507\*

\*We are all located within Northside Improvement Association's boundaries, established in 1912.

#### **ATTACHMENTS:**

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

Protect yourself and those around you. Wear a face covering, stay home, and avoid gatherings with people outside your household. [RiversideCA.gov/COVID-19](http://RiversideCA.gov/COVID-19)

# *The Heritage of* **SPRINGBROOK ARROYO & ENVIRONS** Riverside - Colton - Highgrove - Grand Terrace California, U.S.A.

Pacific Ocean  
Pacific Plate - **San Andreas Fault** - Southern California Batholith  
San Bernardino Mountains - San Bernardino Valley  
Santa Ana River - **Santa Ana River Watershed** - Santa Ana River Flood Plain - Riverside Basin  
San Jacinto Fault - Ancient San Jacinto River - **Pigeon Pass** - Perris Block  
**La Loma Hills** - Blue Mountain - Reche Peak - Box Springs Mountains - Old Point of Rocks - Mt. Rubidoux - Little Mt. Rubidoux  
Springbrook Arroyo - Springbrook Falls - **Springbrook Arroyo Watershed** - Springbrook Meadows  
Cold Springs - Hot Springs - Sulphur Springs - Marshes - Bogs - Agua Mota - Willows - Cattails - Cottonwoods - Oaks  
Kii-Tovaa - **Homeland** - Ki Temal  
Ahmutskupianga - Ahmutskapinga - **Horuuvngna** - Guapa - Guachama  
Rock Shelters - Milling Stones - Manos - Mortar Rocks - Storehouses - Petroglyphs  
America - Nueva Espagna - California - Alta California - De Anza Trail - **El Camino Real**  
Mission San Gabriel de Arcangel 1771 - **Old Spanish Trail 1776** - El Pueblo de la Reina de Los Angeles 1781  
Mojave Desert - Horse Thief Canyon - **Cajon Pass** - Cajon Summit  
Town of San Bernardino 1810 - Earthquake of 1812 - Great Flood of 1815 - Republic of Mexico 1821  
**Jurupa Rancho 1838** - Parish of San Salvador 1842 - San Salvador Parish School - Rancho San Bernardino - Politana  
Rancho Muscupiabe 1843 - Rancho Jurupa - **La Placita de los Trujillos 1843**  
**Battle of Pigeon Pass 1845** - Bandini Donation - Agua Mansa  
La Loma School - Willow Tree Fences of La Placita - **Agua Mansa Cemetery** - Agua Mansa Road  
California Independence 1848 - California Gold Rush 1849 - California Statehood 1850 - County of San Diego - Fence Laws  
County of Los Angeles 1852 - First Church of San Salvador - **Township of San Salvador** - Presidential Election - San Salvador School District  
**Little Church at Agua Mansa 1853** - Bell of San Salvador - County of San Bernardino - City of San Bernardino 1854  
Death of Lorenzo Trujillo 1855 - Earthquake of 1857 - **Great Flood of 1862** - Drought of 1863 - Smallpox Epidemic 1864  
John Brown's Toll Road 1861 - **Trujillo Adobe 1862** - Trujillo Ditch - Trujillo Cantina - Jensen-Alvarado Ranch 1865  
Old Indian Camp at Reche Ridge - Old Stage Stop at Upper Pigeon Pass - Spring Rancheria 1870  
Southern California Colony Association - **Township of Riverside 1871** - Spanish Town - No-Fence Laws 1872  
Spanish Town Flume - Riverside Canal - Gage Canal - **Trujillo Water Co.**  
**Trujillo School District 1875** - Southern Pacific Railroad - California Southern Railroad 1882 - Highgrove Station at Point of Rocks  
Vivienda Water Co. - Riverside Highland Water Co. - Alamo Water Co. - Riverside Water Co.  
City of Riverside 1883 - Santa Fe Railroad 1884 - Town of Highgrove 1887 - City of Colton - **County of Riverside 1893**  
**Elliotta Hot Springs** - Heron Plunge - White Sulphur Springs  
Lake Evans - Boathouse - Bandshell - **Fairmount Park** - Carousel - Sulphur Spring - Carlson Park  
Father Serra Cross - **Easter Sunrise Service** - Huntington Park - Peace Tower  
Highgrove United Methodist Church 1890 - Riverside Public Utilities 1895 - Town of Grand Terrace 1898 - Riverside County Fairgrounds & Racetrack  
Pellissier Vineyards - Pellissier Winery - **Pellissier Ranch 1905** - Pellissier Dairy - Pellissier Road  
Riverside County Courthouse 1904 - Easter Sunrise Service at Mt. Rubidoux 1909  
Old Chase Ranch Nursery - Old Chase Ranch - National Orange Co. - L.V.W. Brown Estate  
Hopalong Cassidy House - **Northside Improvement Association 1912** - Fremont Elementary School  
Cadena Creek - La Cadena Drive - Old 395 - Old Fire Station - Riverside Water Co. Wells  
Earthquake of 1923 - **Flood of 1939** - Santa Ana River Levee  
Old Orangecrest Dairy - Old Staveley Dairy - Sieck Meat Packing Co. - Blacksmith Shop  
**Reid Park** - Hunter Park - Riverside Live Steamers - **Springbrook Golf & Country Club** - Cage Park  
Riverside Freeway 91 - Ontario Freeway 60 - The Interchange  
Dr. Cantwell's Veterinary Hospital - California Aqueduct - Lily Tulip Co. - Bourns - Reid Park Little League 1964  
Riverside County Historical Site 1967 - **Trujillo Adobe** - California State Point of Interest 1968  
**Flood of 1969** - Santa Ana River Levee - Santa Ana River Bike Trail  
Ruth Lewis Community Center - **Ab Brown Sports Complex 1980** - AYSO Region 47  
Highgrove Community Services Area - Highgrove Municipal Advisory Council - Highgrove Library  
Northside Redevelopment Project Area 1990 - **Northside Community Plan 1991** - Riverside General Plan Northside Guidelines 1995  
Riverside Fruit Growers - Riverside Golf Course - Patricia Beatty Elementary School  
Seven Oaks Dam - Santa Ana River Trust - Santa Ana Watershed Project Authority - Santa Ana River Trail & Parkway  
Santa Ana River Wildlife Area - **De Anza Crossing Historic Site** - Hidden Valley Nature Preserve  
Spanish Town Heritage Foundation 2013 - Springbrook Heritage Alliance 2014  
**Riverside Championship Cross Country Course 2015** - Hunter Park Metrolink Station  
Riverside City Landmark #130 - **Trujillo Adobe** - Top Ten U.S. Latino Heritage-Protection Sites #2  
Old Spanish Trail Association-Agua Mansa Chapter 2017 - **Old Spanish National Trail 2017**  
Rivers and Lands Conservancy  
& more...

## **SPRINGBROOK HERITAGE ALLIANCE**

[info@springbrookheritagealliance.org](mailto:info@springbrookheritagealliance.org)

<https://www.facebook.com/springbrookheritagealliance>

<https://www.gofundme.com/springbrook-heritage-alliance-legal>

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

*Please return to:*  
SPRINGBROOK HERITAGE ALLIANCE  
P.O. Box 745, Riverside CA 92502  
(951)787-0617

# *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 pro-rated.
- 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:**

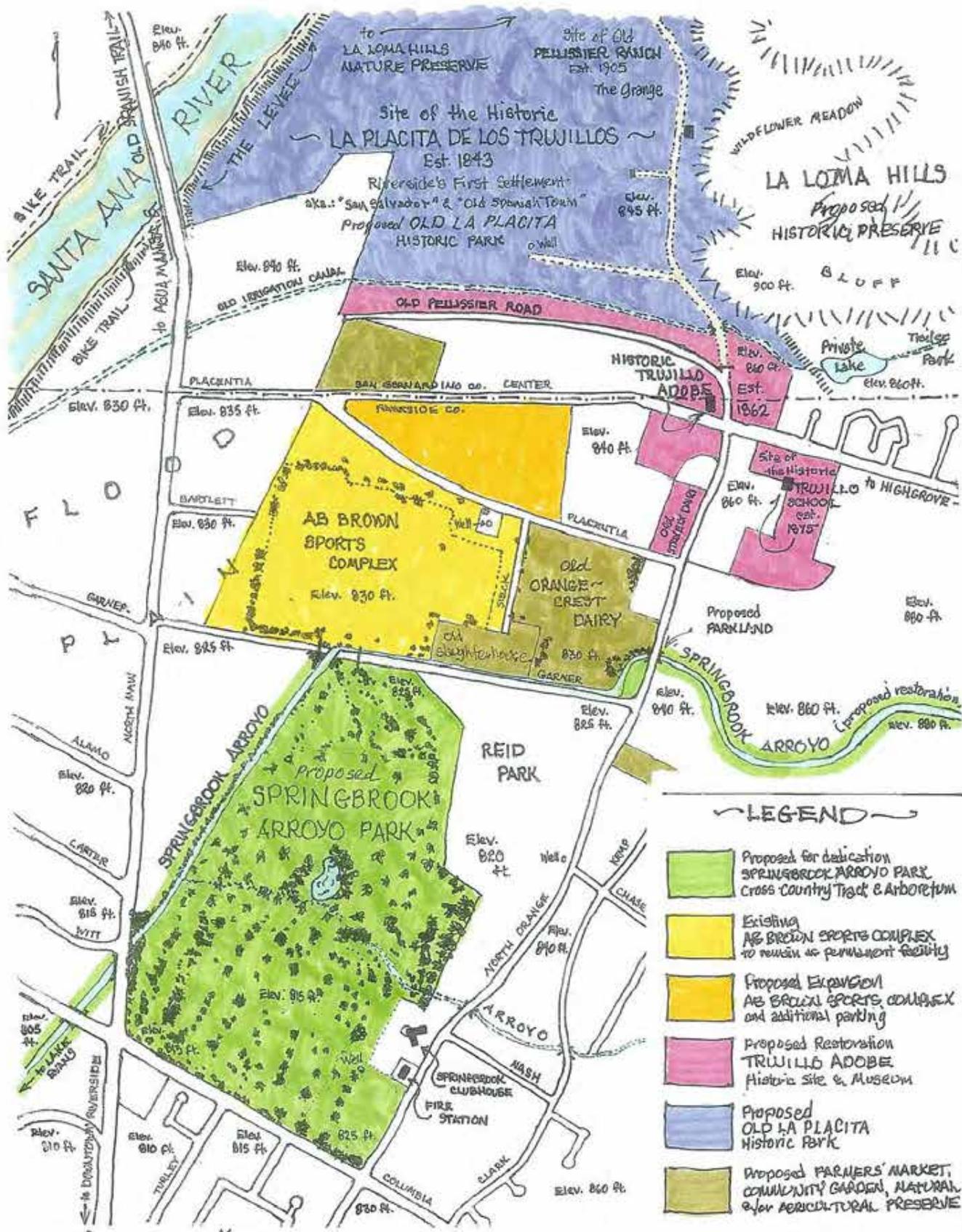
Springbrook Heritage Alliance  
Northside Improvement Association  
Spanish Town Heritage Foundation  
Friends of Blue Mountain  
Friends of Fairmount Park  
University Neighborhood Association  
Academy of Living History Performing Arts

For more information:

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

# SPRINGBROOK HERITAGE PARKLANDS & WALKING TRAILS

## Old Spanish Town Village District



### LEGEND

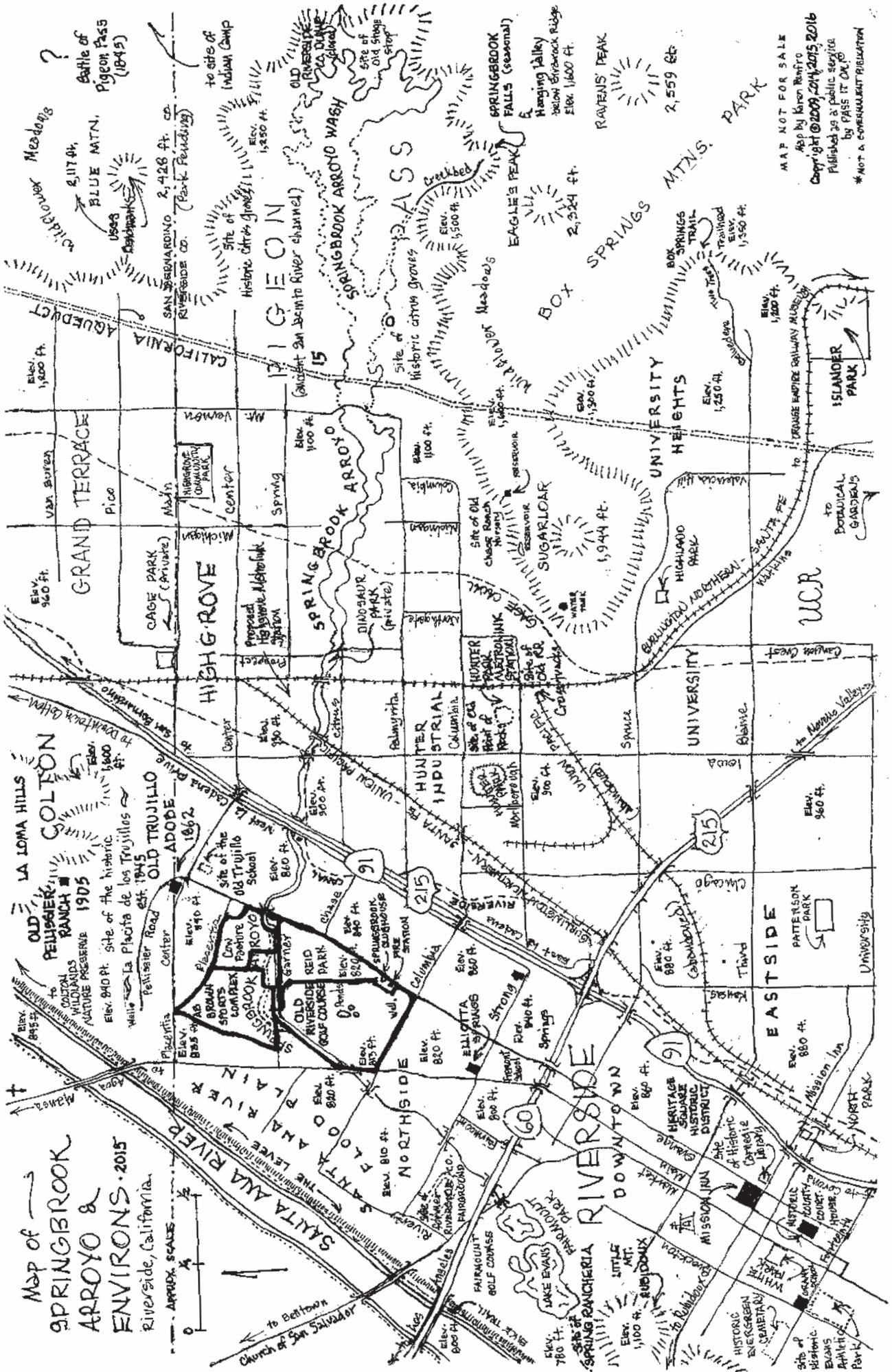
- Proposed for dedication **SPRINGBROOK ARROYO PARK**, Cross Country Track & Arboretum
- Existing **AB BROWN SPORTS COMPLEX** to remain as permanent facility
- Proposed Expansion **AB BROWN SPORTS COMPLEX** and additional parking
- Proposed Restoration **TRUJILLO ADOBE** Historic Site & Museum
- Proposed **OLD LA PLACITA** Historic Park
- Proposed **FARMERS' MARKET, COMMUNITY GARDEN, NATURAL** & **AGRICULTURAL PRESERVE**

Scale: 0 to 1/4 mile

SPRINGBROOK HERITAGE ALLIANCE 2014

[info@springbrookheritagealliance.org](mailto:info@springbrookheritagealliance.org)

Map of  
**SPRINGBROOK  
 ARROYO &  
 ENVIRONS** · 2015  
 Riverside, California.



MAP NOT FOR SALE  
 App by Karen Renfro  
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**US Army Corps  
of Engineers** ®  
Los Angeles District



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**RIVERSIDE 2 LEVEE SYSTEM  
SAN BERNARDINO AND RIVERSIDE COUNTIES,  
CALIFORNIA  
NLD SYSTEM ID # 3805010050**

**PERIODIC INSPECTION REPORT NO 1  
GENERALIZED EXECUTIVE SUMMARY**

**FINAL SYSTEM RATING: UNACCEPTABLE  
FINAL RATING DATE: JANUARY 18, 2013**

PERIODIC INSPECTION REPORT PREPARED BY TETRA TECH, INC.  
FOR THE U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT

SUBMITTED: DECEMBER 2012  
INSPECTED: APRIL 4, 2011

## EXECUTIVE SUMMARY

This Executive Summary provides an introduction to the periodic inspection, an overview of the system, a summary of the major findings of the periodic inspection, and the overall rating for the system.

### 1.1 Scope and Purpose of Periodic Inspections

The purpose of the Riverside 2 Levee System periodic inspection is to identify deficiencies that pose hazards to human life or property. The inspection is intended to identify the issues in order to facilitate future studies and associated repairs, as appropriate.

This assessment of the general condition of the levee system is based on available data and visual inspections. Detailed investigation and analysis involving hydrologic design, topographic mapping, subsurface investigations, testing, and detailed computational evaluations is beyond the scope of this levee system inspection.

### 1.2 System Summary

Riverside 2 Levee System is located in the Cities of Colton and Riverside; in the Counties of San Bernardino and Riverside, respectively; in the State of California. Riverside 2 Levee System forms the east/left bank levee (looking downstream) of the Santa Ana River. Riverside 2 Levee System is composed of two levee segments (see Figure 1). These segments are referred to as Segments 2a and Segment 2b. Segment 2a was constructed by Riverside County is not part of the United States Army Corps of Engineers (USACE) Rehabilitation and Inspection Program (RIP), and therefore not under the authority of USACE. It starts approximately 4,573 feet upstream of Main Street (Station 399+75), and extends downstream to Station 339+00. Segment 2b was constructed by the USACE. It starts at Station 339+00, and extends to approximately 483 feet downstream of Mission Boulevard (Station 200+30). Riverside 2 Levee System is entirely operated and maintained by the Riverside County Flood Control and Water Conservation District (RCFC & WCD). The National Levee Database (NLD) System ID Number for Riverside 2 Levee System is 3805010050.

The RCFC & WCD is the Local Sponsor for the Riverside 2 Levee System.

### 1.3 Summary of Major Deficiencies Found

The levee system was inspected on April 4, 2011. During the periodic inspection of the system, several deficiencies were noted for which remedial actions are required. Specifically, severe bank erosion from the December 2010 storm flows was found and is currently under the USACE RIP process for repair. The following main deficiencies were noted during the periodic inspection of the project features:

- Levee Embankments
  - Segments 2a and 2b: Significant vegetation growth (brush and tall grass) was present within the vegetation-free zone. The vegetation-free zone extends 15 feet outward from both the landward and riverward toes of the levee prism.
  - Segments 2a and 2b: Unpermitted encroachments, which could negatively impact the integrity of the levee, were observed along both segments.

- Segments 2a and 2b: Significant erosion has occurred along the toe of the riverward slope, and could compromise the stability of the levee. It is understood that USACE RIP is in the process of repairing Segment 2b from erosion on the riverside of the levee.
- Segments 2a and 2b: Due to concentration of local runoff, significant erosion gullies have formed on both the riverward and landward slopes of the levee.
- Segment 2b: There are no maintenance records which indicate that the weep holes associated with the concrete slope paving have been regularly cleaned.
- Interior Drainage System
  - Segment 2b: The inlets and outlets of some of the side-drainage structures were obstructed by debris.
  - Segment 2b: Within the past five years, the condition of each side-drainage structure has not been verified using either videotaping by television camera or other visual-inspection method.

#### **1.4 Overall Rating**

The Levee Safety Officer, Los Angeles District, has determined the overall system rating of Riverside 2 Levee to be “Unacceptable.” An “Unacceptable” system rating is defined as:

*The Periodic Inspection has identified one (or more) System Components which are rated Unacceptable and require immediate correction. The deficiency (or deficiencies) identified have resulted in an Unacceptable System rating and seriously impair the functioning of the flood protection system and pose unacceptable risk to public safety.*

The Local Sponsor will be notified of the overall rating of the levee system by letter with instructions to correct the “Unacceptable” rated items not related to the RIP repair as soon as possible. A public notification will be made regarding this levee system and the periodic inspection rating.

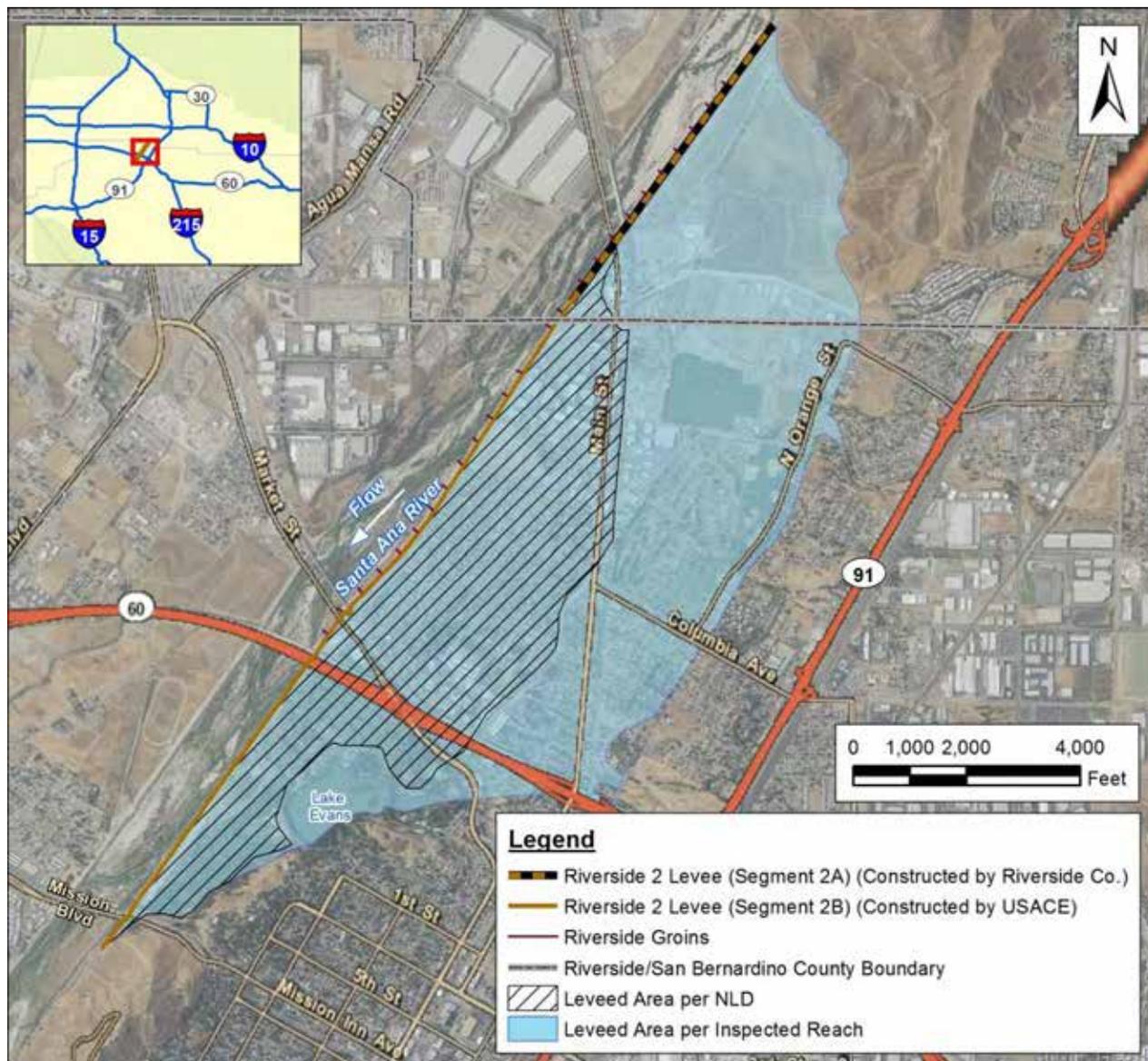


Figure 1. Riverside 2 Levee System

**Andrade, Frances**

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**From:** Karen Renfro <k.a.renfro7@gmail.com>  
**Sent:** Wednesday, September 02, 2020 6:10 PM  
**To:** Murray, David; Andrade, Frances; Kopaskie-Brown, Mary; Welch, David  
**Cc:** Springbrook Heritage Alliance; Peter Wohlgemuth; erin snyder; Jim Wood; Nancy Melendez; Chris Hebert; Irene Lozano; johnkrick@charter.net; Marisa Yeager; Media-morrisz1; Pat Stewart; richard7austin@gmail.com Austin; Barbara Wilson  
**Subject:** [External] SPRINGBROOK HERITAGE ALLIANCE TO RIVERSIDE PLANNING COMMISSION SEPT. 3, 2020 AGENDA ITEM #4  
**Attachments:** 2014 SHA Park Plan 2017-08-15 001 map.cleaned.pdf; SHAparkproposal (1).cleaned.pdf; SHApetition (1).cleaned.pdf; Heritage of Springbrook Arroyo.cleaned.pdf; pdf.cleaned.pdf; Riverside2.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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# Springbrook Heritage Alliance

*Saving the treasures of the Springbrook Arroyo Watershed communities*

**RIVERSIDE - COLTON - HIGHGROVE - GRAND TERRACE**

Sept. 1, 2020

Riverside Planning Commission

City of Riverside

3900 Main Street

Riverside, California 92522

CC: Chairman and Members of the Riverside Planning Commission

**INTERJURISDICTIONAL SPECIFIC PLAN FOR RIVERSIDE'S NORTHSIDE & COLTON'S PELLISSIER RANCH**

P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP) P19-0066 (PEIR), P20-0443 (RZ)

Agenda Item #4

Honorable Chairman and Members of the Riverside Planning Commission:

Springbrook Heritage Alliance appreciates this opportunity to offer our comments on the actions before you relating to the adoption of the Northside Specific Plan & PEIR as presented by the Northside Specific Plan Team.

It has long been our wish that the City of Riverside would adopt a Specific Plan for the Northside to reflect the wishes of the residents and businesses who have made this area their home. However, although the plan they have proposed contains a wide variety of land uses--old and new--it falls

short of being a realistic approach to the business of improving the well-being of the people who have invested their whole lives in this neighborhood in a way that serves their needs in particular of the surrounding communities in general.

We think there is a better way.

#### **RIVERSIDE'S FORGOTTEN LEGACY:**

The Northside neighborhood is the City's oldest, with unique and remarkable history that deserves to be recognized and cherished. We have identified many of them on our *Map of the Springbrook Arroyo & Environs* and *Heritage of the Springbrook Arroyo & Environs* which are attached below.

In 2014, SHA members adopted our *Springbrook Heritage Parklands & Walking Trails* plan to save the natural, cultural and historical treasures of the Springbrook Arroyo communities of Riverside, Colton, Highgrove and Grand Terrace. To achieve this, we propose the establishment of a Spanish Town Village Historical District, a mechanism for protecting, restoring, and developing these irreplaceable treasures in the area bounded by Columbia Avenue, West La Cadena Drive, La Loma Hills & Pellissier Ranch, and the Santa Ana River levee; restoration of Springbrook Arroyo along its entire course wherever possible; dedication of public recreational and open space facilities as permanent parklands, including the former Springbrook Golf Club (now the Championship CIF Cross Country Course), Ab Brown Sports Complex, Reid Park, and Pellissier Ranch.

See Joyce Carter Vickery's *Defending Eden: New Mexican Pioneers in Southern California 1830-1890* (UCR History Department & Riverside Municipal Museum, 1977).

#### **ECONOMIC CONSIDERATIONS OF LAND USE:**

Our proposal does not require an outlay of public funds from local municipalities. The preservation of the public facilities could be achieved through grants from public and private foundations, and the Spanish Town Village District private-sector marketplace venues through investment by small-scale entrepreneurs. This could result in an economic renaissance for the Northside, based entirely on land use policy honoring the neighborhood's heritage. Besides new jobs and opportunities this would inspire, the new businesses would generate additional tax revenue from diverse sources--a much better proposition than putting all the new land uses into the basket of expensive large-scale projects. Our proposal is supported by local organizations and individuals.

When the City undertook to develop a Specific Plan for the Northside, we supported their efforts. We asked that our Parklands proposal be considered as an alternative to the other proposals for land use on the Northside. It has been so considered, and even though we are pleased it passed muster with the Environmental standards of CEQA, we are not so pleased to see that the Northside Specific Plan Team apparently did not read or understand our proposal, which clearly states our economic objective and how we propose to go about carrying it out.

Please see our *Map, Outline, and Petition* attached below.

#### **LAND USE ON THE NORTHSIDE:**

Now, we understand that Riverside has long considered the City's oldest neighborhood, whose cultural history precedes the founding of Riverside by perhaps a thousand years, as wasteland best suited for industrial and commercial development. For about 800 years it served as hunting, fishing and foraging land, site for sacred ceremonies, and occasional occupation during very dry periods. For 145 years it was agricultural, rural agricultural, and rural residential. In 1969 the Santa Ana River Levee was constructed with the assurance the Northside was protected from periodic flooding from the river. However, the flooding does not protect the Northside from rainfall run-off which has nowhere to go but the levee. That is why this area was so good for agriculture. But, the new residential zoning on the west-side of Main, and all the commercial and industrial zoning below Orange established by the Redevelopment Agency in 1990 is subject to periodic flooding. Nobody has been able to figure out how to mitigate this problem. The Redevelopment Agency was shut down in 2011 but the inappropriate zoning remains. In addition, the floodplain below Orange soils are subject to liquefaction and subsidence under certain conditions which occur at unpredictable intervals. It has happened before and it can happen again.

The close proximity of industrial and commercial to long-established single-family residential, public recreational and youth sports, small businesses and the historic Trujillo Adobe (ca. 1862)--now a City Landmark with historical designations from the County of Riverside and State of California--created land use conflicts that cannot be resolved if the City was not determined to turn this part of the Northside into an industrial/commercial center. Northside residents have opposed these changes all along--in fact the Northside Improvement Association (formed in 1912) has been fighting to bring in city amenities like sewers and sidewalks while keeping industrial and commercial out of their neighborhood for more than 100 years. There is no mitigation for the destruction of a neighborhood's character and heritage.

These sentiments are reflected in the Northside Plan of 1991 and the Riverside General Plan's guidelines for the Northside. Our *Parklands* proposal is consistent with the findings of these two documents, and despite the claim that it would not stimulate the neighborhood economy or generate new tax revenue for the cities of Riverside and Colton, that is one of the intentions of our proposal.

Most importantly, despite current sentiment among developers and public officials, property taxes are neither the best way nor the only way to generate lots of tax revenue for the local treasury. Our *Parklands* proposal shows how to do this by letting loose the energy of individuals and small investors to develop operations that generate new tax revenue from a multiplicity of sources--in the long run a much more stable economy and much more beneficial to the neighborhood, and the City. According to a 2012 government report, the three most common impacts of historical preservation are increases in property values, job creation, and tourism. See "The Impact of Historical

Preservation and Endowment" by Mimi Morris, Executive Officer of California's Cultural and Historic Endowment.

See also California's Office of Historical Preservation.

### **ISSUES REGARDING THE NORTHSIDE SPECIFIC PLAN PROCESS:**

It would be good if you understood how frustrating this has been for the people of the Northside to participate in the NSP process.

First, the NSP Team did not notify all the property owners in the study area by mail even though a change to land use policy is serious business. They said it would cost too much money and expected local residents and business owners to spread the word, forgetting that we are volunteers, not getting paid for all the extra work & expense involved, and have other more pressing obligations to fulfill. Turn-around times were scheduled for the convenience of the NSP Team, There was a succession of community sessions and workshops that were held in the Northside, and never were all the people who needed to know notified of these events. Local groups, including Northside Improvement Association, Spanish Town Heritage Foundation, OSTA-Agua Mansa Chapter, and SHA did the best we could, but turnouts were low. This was interpreted to mean lack of interest. Nothing could be further from the truth.

Second, when the Northside Specific Plan Team began meeting with local residents they said our discussions would start from a blank slate. They were not going to use the Northside Community Plan or General Plan's Northside Guidelines. Recently, we learned that the Northside Specific Plan Team was informed by city officials that they wanted a plan that would benefit our City's water supplies and generate property tax revenue for the public treasury.

This seems to explain why, despite the pleas of Northside residents, visiting sports enthusiasts, fans of the Trujillo Adobe, and local history buffs, the NSP calls for expensive, radical and unnecessary changes to the Springbrook Arroyo area below Orange Street. The NSP offers several alternatives for the Arroyo involving re-routing the Arroyo from its existing course (an enormously expensive project), and new commercial and industrial zoning in close proximity to La Loma Hills, the Trujillo Adobe, existing single-family residential, new single-family residential, youth sports and public recreational facilities.

Third, the worst of these proposes to separate the Arroyo at West La Cadena and re-route the waterway by connecting it to the Highgrove Channel a half-mile away across Center Street and the County line and use recycled water to keep it flowing year-round. This alternative does not explain what happens to the water in the upper Arroyo above the proposed cut. It would also be prohibitively expensive and intrusive. Most of all, it is totally unnecessary. If the City dedicated the former golf course as a permanent local native arboretum & botanical garden-cross country course-public parkland, the three little ponds could be enlarged to make one lake that would sequester run-off water, help replenish underground water supplies, attract wild waterfowl, provide sustenance for local birds, and turn the park into a little paradise. The work involved could be done

by volunteers under the supervision of the City staff. This suggestion is part of our *Parklands* proposal.

Fourth, the final proposal, consisting of many components and several alternatives, is not one that was presented in a community session, and we never saw some of the components until the document was released with the final PEIR. Even more frustrating, we never saw the proposed zoning maps until the agenda item for this hearing was posted twelve days ago and some of us didn't see them until late last week or early this week.

So there is much that is new to us, and we have not had sufficient time to study it as well as we'd have liked. And now we understand that if we do not bring up every point of concern to us at this meeting, we cannot bring it up before the City Council. The lack of transparency regarding this hearing means that the Northside Specific Plan is not a neighborhood plan at all. It is being imposed on us by city officials, professional consultants from out of town and special interests who wish to make a profit on our misery. All the property owners, residents and businesses have still not been notified about the NSP or this hearing. And because of the COVID restrictions our grassroots grapevine was unable to pick up the slack.

### **LAND USE PLANNING:**

We believe that all property owners and their tenants have an equality of rights, and no one has a right to cause harm to their neighbors. However a site is zoned, new development should always be beneficial to the neighbors and the neighborhood--and they are the ones who should determine this. Title 19 and Title 19 both make this clear in the introductions.

We question the obvious assumption of city officials and urban planners that job creation is dependent upon noisy operations.

We question the wisdom of building high-density housing adjacent to the NSP's proposed Central Park. While it would provide open space to the high-density residents, we can see it becoming an attractive nuisance for the fringe population and homeless after hours.

We question the wisdom of building high-density housing on commercial streets or streets designated as truck routes, or areas in the flood plain below Orange Street.

We question the wisdom of building new high-density housing in an older single-family neighborhood that is eligible for designation as a historical district.

We question designating truck routes through existing residential neighborhoods, or neighborhoods with mixed-use residential, retail, restaurant, and small-scale commercial, or neighborhoods with sensitive historical landmarks.

We question whether uses not identified in the NSP Tables are allowed.

We recommend that new single-family and senior housing be developed on vacant land above Orange Street within existing residential zones.

See William Cowan's "The Trujillo Adobe and Warehousing of Southern California's Inland Empire" (Huntington-USC Institute of California and the West):

<https://iceblog.wordpress.com>

### **AESTHETICS & AIR QUALITY:**

The charm of the Northside is its rural character in an urban setting. Right now, some of the properties look a little ragged, but this is not a sign of blight so much as a sign of the instability of land use in the Northside. If the City goes with the NSP as proposed, allowing high-density housing and large-scale commercial and industrial will cause the Northside to become unlivable for

those who already live and work here, the neighborhood will deteriorate accordingly. The aesthetics of new development on neighborhood livability affects Air Quality and other Quality of Life issues. And Air Quality suffers in direct proportion from a neglect of the aesthetic factors of land use. The Northside already has bad air quality, there is no need to make it worse. We do not have to live with heavy truck traffic, noxious chemicals or destruction of natural open spaces to improve the neighborhood's economy. The *Springbrook Heritage Parklands & Walking Trails* proposal shows how to do it.

The NSP-PEIR Air Quality findings are not consistent, or even very useful to an analysis of the NSP. Ambient Air Quality Standards are not comparable or helpful. Trip Rate Assumptions do not include existing or proposed sports or recreational uses. Findings of Negative Impacts are Significant, yet Mitigations cite levels after correction as still Significant and Unavoidable. Yet, the same document shows our *Parklands* proposal not only has no negative impacts to aesthetics and air quality, but is likely to improve both.

### **GEOLOGY/SOILS:**

There is no legitimate reason to propose any type of housing or intense urban or industrial development in the Santa Ana River floodplain or the tableland above Orange Street to the east. The bottomland is unstable, subject to flooding from rainfall run-off and subsidence as we mentioned above. The Riverside General Plan 2025 shows it is high-risk for liquefaction. Liquefaction can occur without rain or seismic activity, but is much less likely. The NSP PEIR admits this is so.

There are earthquake faults nearby at the top of Pigeon Pass and Reche Canyon, and fracture zones all over the area. According to recent examinations by flood control officials, the Santa Ana River levee is probably not capable of handling a 100-year flood. It is now known that the great Agua Mansa Flood of 1862, which washed the villages of Agua Mansa and La Placita de los Trujillos away (thankfully, no lives were lost), was of greater magnitude than that. The tableland is now almost entirely developed with single-family residential because until the Redevelopment Agency rezoned the Northside few people were foolhardy to build housing below Orange Street.

The danger of subsidence increases with higher rainfall and seismic activity. With seismic activity or even the constant weight of any superstructure, the soils could deform and compromise the structural integrity of the building. Given this knowledge, wouldn't the City be liable for allowing any development on these suspect soil types? Stabilizing gels are mentioned in passing as a potential mitigation, but there is no supporting text about projects that have successfully used it in the United States or in situations comparable to the Northside.

We have questions about this gel: How do we know they work? What are they made of? What are the side-effects we need to know about? Are they hazardous to human, animals, plants, soils, water supplies? Much more information is needed to evaluate the potential use of these gels.

Alternatively, perhaps the best use of the lain underlain by these unstable soils is open space and rainwater sequestering from trees and vegetation, as proposed in our *Parklands* plan.

### **HYDROLOGY/WATER QUALITY:**

As long-time residents of the Northside, we have seen flooding from rainfall run-off submerge the intersections of Main & Placentia, Center & Placentia, Main & Columbia, Main & Strong, Market Street, many side streets along the levee, and so forth too many times to count. One of our members recalls seeing floodwaters rise all the way to Orange Street three times since 1969, the

year the Santa Ana River levee was built, and these were not even close to being 100-year floods. This flooding occurs even during drought years.

The elevation at Main & Placentia is 830-ft., at Main & Columbia 825-ft., at Main & Strong 800-ft. The new housing down below Main Street experiences flooding often enough nobody who lives there is surprised anymore, but the question we have to ask is why did the City of Riverside allow residential development there at all? The answer is because FEMA doesn't look at rainfall run-off--just at how much a dam or a levee can bear. And in January 2013 the US Army Corps of Engineers issued a report about that section of the Santa Ana River Levee that rated its condition "unacceptable". We do not know if the damage has been repaired or the levee is being properly maintained since then. See below for the report.

According to the NSP Hydrology & Water Quality Section, most of the NSP Study Area is located in the 100-year flood plain of both the Highgrove Channel and Springbrook Arroyo. Potential fixes are proposed for re-constructing the Highgrove Channel to avoid a flood scenario, but except for channel widening, not for the Arroyo. This means much of the Northside will be awash in the event of a 100-year flood. The map on page 517 of the PEIR suggests the extent of the problem. We have questions about this: How could the City authorize development on these lands knowing disaster, though unpredictable as to timing, is inevitable. There is not enough money in the City treasury to cover lawsuits caused by this flooding, flooding that will only be made worse by new impervious surfaces created by proposed NSP development. It seems incredible the City would put itself in this position.

We suppose there are engineering solutions to overcome this problem--all of them expensive. Even so, they should be explored before this NSP and PEIR are finalized and adopted. Again, the best solution may be simple: more open space as we propose in our *Parklands* plan attached below. See *U.S. Army Corps of Engineers--Los Angeles District Report on Periodic Inspection of Santa Ana River at Riverside Upper 2, Jan. 18, 2013.*

## **TRANSPORTATION:**

We are concerned with the continued use of the Northside neighborhood for pass-through heavy truck traffic that is merely seeking convenient freeway access. On the one hand, it is great to know that Main, Center and Columbia have been named as "Complete Streets" with all the enhancements that accompany that designation. However, if these improvements only attract even more truck traffic, how does that benefit the local residents and shoppers who have to dodge these trucks? The Northside would be well-served with additional service by the RTA, but the big busses are not the best way to do this. The smaller, little red trolley-style busses would be a better fit, and offer more flexibility for the times and routes throughout the day, the week and the year. Service needs to start very early and run very late to allow people to get to work or school and home again. Until that is possible, which may be never, people will have to use their own private vehicles to get around. This should be taken into account to avoid unnecessary inconveniences to the residents and businesses of the Northside.

Pedestrian crosswalks at intersections, whether there is a Stop sign or Traffic Signal, should be required. The lines form a box which forces motorists to come to a stop before they get to the edge of the intersection, which is an additional safety measure for pedestrians and motorists, as drivers often have a hard time seeing pedestrians, especially at night, in time to slow down or stop.

Any changes to existing streets should be done in a sequence that will not cause trouble with traffic flow. Make sure if additional traffic is being directed somewhere, the streets receiving the new vehicles are prepared to deal with it.

### **CUMULATIVE IMPACTS:**

All environmental impacts identified in the NSP-PEIR are significant if taken cumulatively. These should include existing and proposed warehouses and massive logistics centers in Riverside, Moreno Valley, Bloomington, Fontana and elsewhere in the region. They should all be considered separately and together in relation to their negative effects on Quality of Life for the people of the Northside.

The NSP proposes many square feet of new commercial, industrial and research park projects without making a realistic assessment of the effects of this type of development on the people and the neighborhood, or surrounding communities.

The NSP, essentially, is a blueprint for adopting a "Growth at Any Cost" land use policy. Alternatively, the Cumulative Effects of our *Parklands* proposal are all beneficial and would be undertaken at a moderate pace that people could adjust to without undue stress.

### **CONCLUSION:**

We hope you will include our *Parklands* proposal for a *Spanish Town Village Historical District* as part of the final Northside Specific Plan. And we thank you for your consideration of our request. Please refer to the attachments below

### **FINAL REMARKS:**

We also hope you will look into the Northside Specific Plan adoption process for clarification about what comes next because what is happening now is not what we were told would be happening, and we are not sure of what is supposed to be happening. Our Due Process rights are at stake, so we didn't think this should be overlooked. Thank you for your kind attention to our concerns.

Respectfully yours,  
Karen Renfro, Chair & Spokesman  
Springbrook Heritage Alliance  
3064 Lime Street  
Riverside, California 92501\*  
[info@springbrookheritagealliance.org](mailto:info@springbrookheritagealliance.org)  
[www.springbrookheritagealliance.org](http://www.springbrookheritagealliance.org)  
<https://www.facebook.com/springbrookheritagealliance>

Pete Wohlgemuth, Vice-Chair  
686 Forest Park Road  
Riverside, California 92501\*

Erin Snyder, Treasurer and Acting Secretary  
1645 Mathews Street  
Riverside, California 92507\*

\*We are all located within Northside Improvement Association's boundaries, established in 1912.

**ATTACHMENTS:**

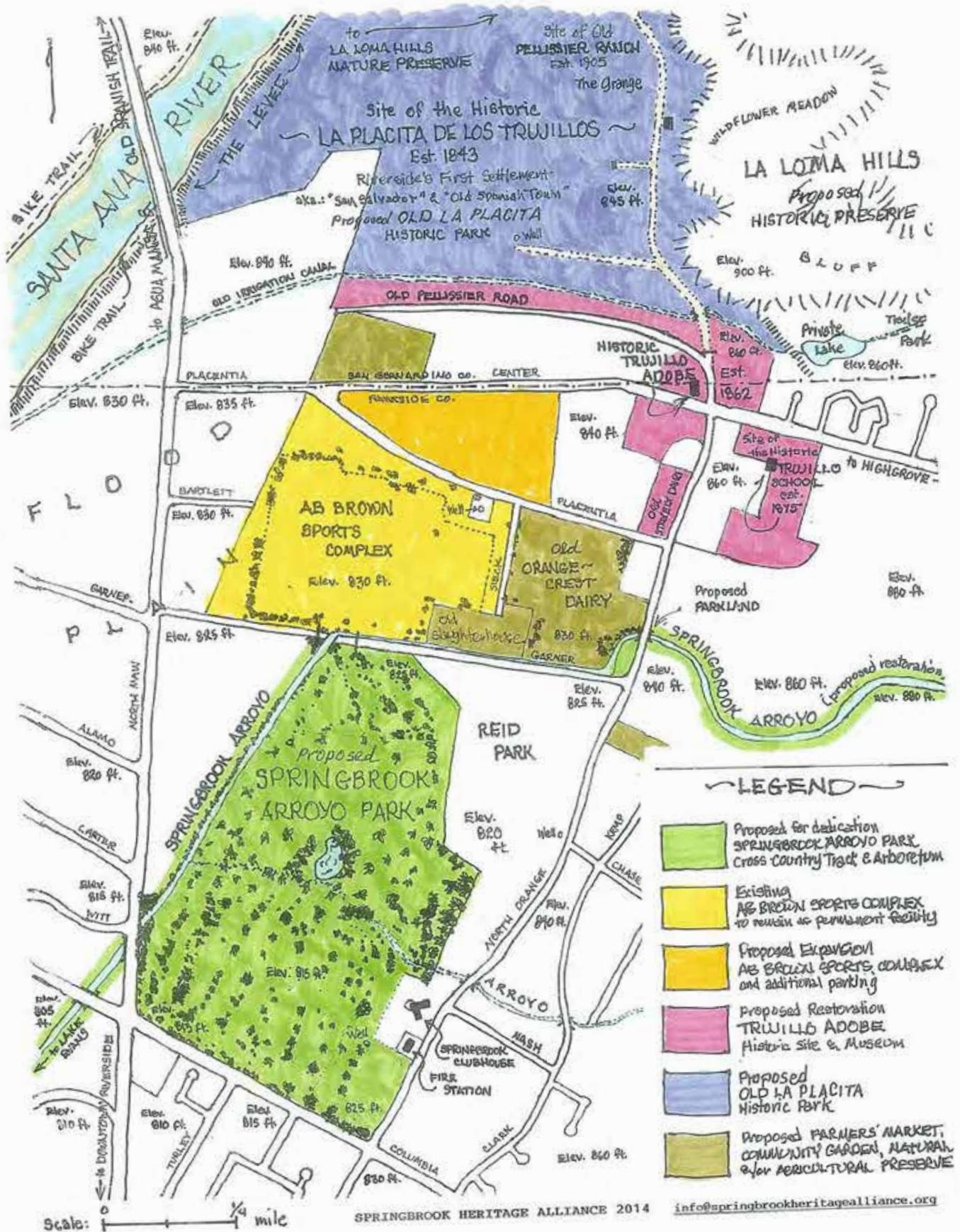
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# SPRINGBROOK HERITAGE PARKLANDS & WALKING TRAILS

## Old Spanish Town Village District



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

*Please return to:*  
SPRINGBROOK HERITAGE ALLIANCE  
P.O. Box 745, Riverside CA 92502  
(951)787-0617

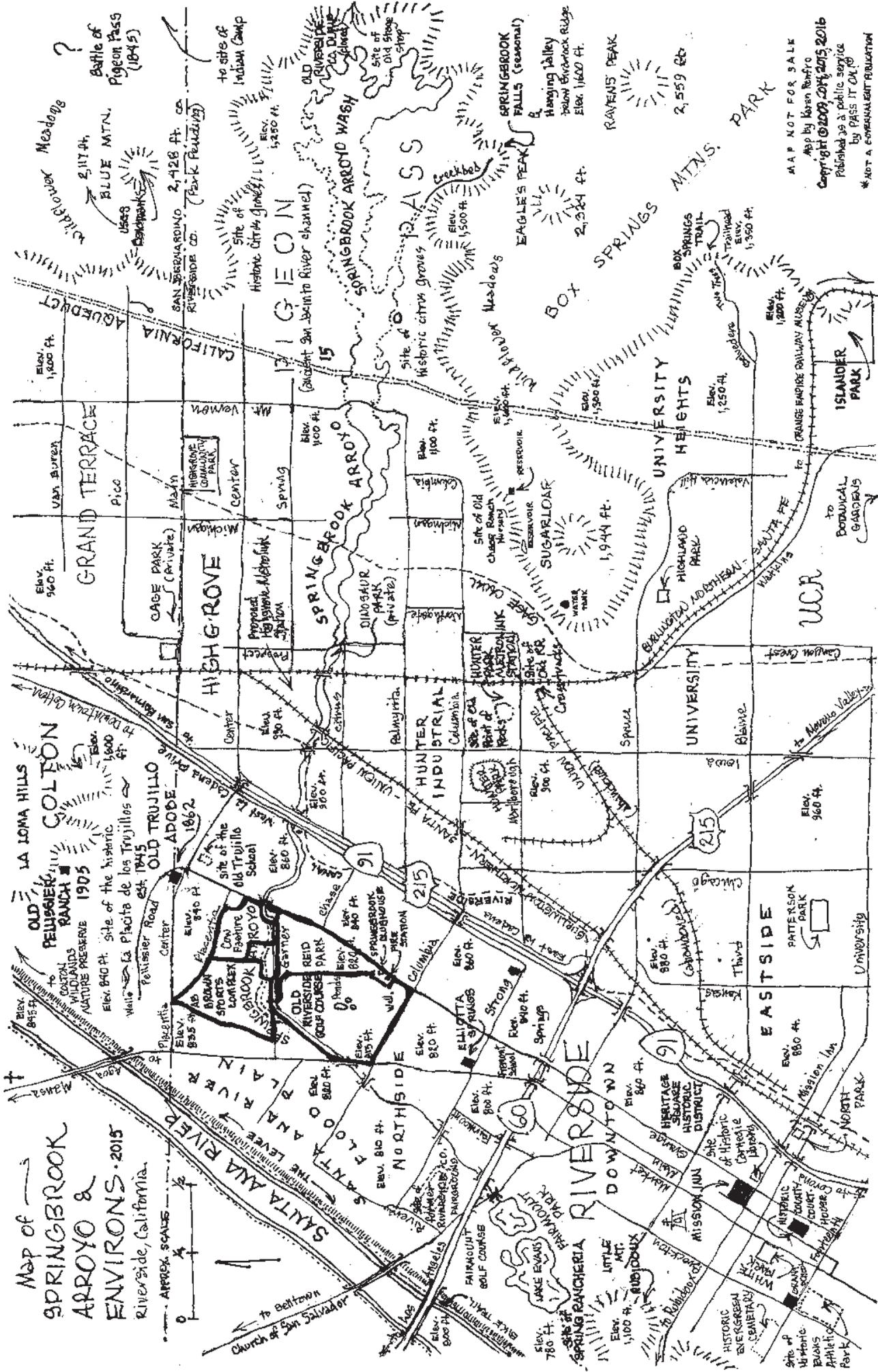
# *The Heritage of* **SPRINGBROOK ARROYO & ENVIRONS** Riverside - Colton - Highgrove - Grand Terrace California, U.S.A.

Pacific Ocean  
Pacific Plate - **San Andreas Fault** - Southern California Batholith  
San Bernardino Mountains - San Bernardino Valley  
Santa Ana River - **Santa Ana River Watershed** - Santa Ana River Flood Plain - Riverside Basin  
San Jacinto Fault - Ancient San Jacinto River - **Pigeon Pass** - Perris Block  
**La Loma Hills** - Blue Mountain - Reche Peak - Box Springs Mountains - Old Point of Rocks - Mt. Rubidoux - Little Mt. Rubidoux  
Springbrook Arroyo - Springbrook Falls - **Springbrook Arroyo Watershed** - Springbrook Meadows  
Cold Springs - Hot Springs - Sulphur Springs - Marshes - Bogs - Agua Mota - Willows - Cattails - Cottonwoods - Oaks  
Kii-Tovaa - **Homeland** - Ki Temal  
Ahmutskupianga - Ahmutskapinga - **Horuuvngna** - Guapa - Guachama  
Rock Shelters - Milling Stones - Manos - Mortar Rocks - Storehouses - Petroglyphs  
America - Nueva Espagna - California - Alta California - De Anza Trail - **El Camino Real**  
Mission San Gabriel de Arcangel 1771 - **Old Spanish Trail 1776** - El Pueblo de la Reina de Los Angeles 1781  
Mojave Desert - Horse Thief Canyon - **Cajon Pass** - Cajon Summit  
Town of San Bernardino 1810 - Earthquake of 1812 - Great Flood of 1815 - Republic of Mexico 1821  
**Jurupa Rancho 1838** - Parish of San Salvador 1842 - San Salvador Parish School - Rancho San Bernardino - Politana  
Rancho Muscupiabe 1843 - Rancho Jurupa - **La Placita de los Trujillos 1843**  
**Battle of Pigeon Pass 1845** - Bandini Donation - Agua Mansa  
La Loma School - Willow Tree Fences of La Placita - **Agua Mansa Cemetery** - Agua Mansa Road  
California Independence 1848 - California Gold Rush 1849 - California Statehood 1850 - County of San Diego - Fence Laws  
County of Los Angeles 1852 - First Church of San Salvador - **Township of San Salvador** - Presidential Election - San Salvador School District  
**Little Church at Agua Mansa 1853** - Bell of San Salvador - County of San Bernardino - City of San Bernardino 1854  
Death of Lorenzo Trujillo 1855 - Earthquake of 1857 - **Great Flood of 1862** - Drought of 1863 - Smallpox Epidemic 1864  
John Brown's Toll Road 1861 - **Trujillo Adobe 1862** - Trujillo Ditch - Trujillo Cantina - Jensen-Alvarado Ranch 1865  
Old Indian Camp at Reche Ridge - Old Stage Stop at Upper Pigeon Pass - Spring Rancheria 1870  
Southern California Colony Association - **Township of Riverside 1871** - Spanish Town - No-Fence Laws 1872  
Spanish Town Flume - Riverside Canal - Gage Canal - **Trujillo Water Co.**  
**Trujillo School District 1875** - Southern Pacific Railroad - California Southern Railroad 1882 - Highgrove Station at Point of Rocks  
Vivienda Water Co. - Riverside Highland Water Co. - Alamo Water Co. - Riverside Water Co.  
City of Riverside 1883 - Santa Fe Railroad 1884 - Town of Highgrove 1887 - City of Colton - **County of Riverside 1893**  
**Elliotta Hot Springs** - Heron Plunge - White Sulphur Springs  
Lake Evans - Boathouse - Bandshell - **Fairmount Park** - Carousel - Sulphur Spring - Carlson Park  
Father Serra Cross - **Easter Sunrise Service** - Huntington Park - Peace Tower  
Highgrove United Methodist Church 1890 - Riverside Public Utilities 1895 - Town of Grand Terrace 1898 - Riverside County Fairgrounds & Racetrack  
Pellissier Vineyards - Pellissier Winery - **Pellissier Ranch 1905** - Pellissier Dairy - Pellissier Road  
Riverside County Courthouse 1904 - Easter Sunrise Service at Mt. Rubidoux 1909  
Old Chase Ranch Nursery - Old Chase Ranch - National Orange Co. - L.V.W. Brown Estate  
Hopalong Cassidy House - **Northside Improvement Association 1912** - Fremont Elementary School  
Cadena Creek - La Cadena Drive - Old 395 - Old Fire Station - Riverside Water Co. Wells  
Earthquake of 1923 - **Flood of 1939** - Santa Ana River Levee  
Old Orangecrest Dairy - Old Staveley Dairy - Sieck Meat Packing Co. - Blacksmith Shop  
**Reid Park** - Hunter Park - Riverside Live Steamers - **Springbrook Golf & Country Club** - Cage Park  
Riverside Freeway 91 - Ontario Freeway 60 - The Interchange  
Dr. Cantwell's Veterinary Hospital - California Aqueduct - Lily Tulip Co. - Bourns - Reid Park Little League 1964  
Riverside County Historical Site 1967 - **Trujillo Adobe** - California State Point of Interest 1968  
**Flood of 1969** - Santa Ana River Levee - Santa Ana River Bike Trail  
Ruth Lewis Community Center - **Ab Brown Sports Complex 1980** - AYSO Region 47  
Highgrove Community Services Area - Highgrove Municipal Advisory Council - Highgrove Library  
Northside Redevelopment Project Area 1990 - **Northside Community Plan 1991** - Riverside General Plan Northside Guidelines 1995  
Riverside Fruit Growers - Riverside Golf Course - Patricia Beatty Elementary School  
Seven Oaks Dam - Santa Ana River Trust - Santa Ana Watershed Project Authority - Santa Ana River Trail & Parkway  
Santa Ana River Wildlife Area - **De Anza Crossing Historic Site** - Hidden Valley Nature Preserve  
Spanish Town Heritage Foundation 2013 - Springbrook Heritage Alliance 2014  
**Riverside Championship Cross Country Course 2015** - Hunter Park Metrolink Station  
Riverside City Landmark #130 - **Trujillo Adobe** - Top Ten U.S. Latino Heritage-Protection Sites #2  
Old Spanish Trail Association-Agua Mansa Chapter 2017 - **Old Spanish National Trail 2017**  
Rivers and Lands Conservancy  
& more...

## **SPRINGBROOK HERITAGE ALLIANCE**

[info@springbrookheritagealliance.org](mailto:info@springbrookheritagealliance.org)  
<https://www.facebook.com/springbrookheritagealliance>  
<https://www.gofundme.com/springbrook-heritage-alliance-legal>

Map of  
**SPRINGBROOK & ARROYO**  
 Environs, California.



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 Map by Karen Reafo  
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**US Army Corps  
of Engineers** ®  
Los Angeles District



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**RIVERSIDE 2 LEVEE SYSTEM  
SAN BERNARDINO AND RIVERSIDE COUNTIES,  
CALIFORNIA  
NLD SYSTEM ID # 3805010050**

**PERIODIC INSPECTION REPORT NO 1  
GENERALIZED EXECUTIVE SUMMARY**

**FINAL SYSTEM RATING: UNACCEPTABLE  
FINAL RATING DATE: JANUARY 18, 2013**

PERIODIC INSPECTION REPORT PREPARED BY TETRA TECH, INC.  
FOR THE U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT

SUBMITTED: DECEMBER 2012  
INSPECTED: APRIL 4, 2011

## EXECUTIVE SUMMARY

This Executive Summary provides an introduction to the periodic inspection, an overview of the system, a summary of the major findings of the periodic inspection, and the overall rating for the system.

### 1.1 Scope and Purpose of Periodic Inspections

The purpose of the Riverside 2 Levee System periodic inspection is to identify deficiencies that pose hazards to human life or property. The inspection is intended to identify the issues in order to facilitate future studies and associated repairs, as appropriate.

This assessment of the general condition of the levee system is based on available data and visual inspections. Detailed investigation and analysis involving hydrologic design, topographic mapping, subsurface investigations, testing, and detailed computational evaluations is beyond the scope of this levee system inspection.

### 1.2 System Summary

Riverside 2 Levee System is located in the Cities of Colton and Riverside; in the Counties of San Bernardino and Riverside, respectively; in the State of California. Riverside 2 Levee System forms the east/left bank levee (looking downstream) of the Santa Ana River. Riverside 2 Levee System is composed of two levee segments (see Figure 1). These segments are referred to as Segments 2a and Segment 2b. Segment 2a was constructed by Riverside County is not part of the United States Army Corps of Engineers (USACE) Rehabilitation and Inspection Program (RIP), and therefore not under the authority of USACE. It starts approximately 4,573 feet upstream of Main Street (Station 399+75), and extends downstream to Station 339+00. Segment 2b was constructed by the USACE. It starts at Station 339+00, and extends to approximately 483 feet downstream of Mission Boulevard (Station 200+30). Riverside 2 Levee System is entirely operated and maintained by the Riverside County Flood Control and Water Conservation District (RCFC & WCD). The National Levee Database (NLD) System ID Number for Riverside 2 Levee System is 3805010050.

The RCFC & WCD is the Local Sponsor for the Riverside 2 Levee System.

### 1.3 Summary of Major Deficiencies Found

The levee system was inspected on April 4, 2011. During the periodic inspection of the system, several deficiencies were noted for which remedial actions are required. Specifically, severe bank erosion from the December 2010 storm flows was found and is currently under the USACE RIP process for repair. The following main deficiencies were noted during the periodic inspection of the project features:

- Levee Embankments
  - Segments 2a and 2b: Significant vegetation growth (brush and tall grass) was present within the vegetation-free zone. The vegetation-free zone extends 15 feet outward from both the landward and riverward toes of the levee prism.
  - Segments 2a and 2b: Unpermitted encroachments, which could negatively impact the integrity of the levee, were observed along both segments.

- Segments 2a and 2b: Significant erosion has occurred along the toe of the riverward slope, and could compromise the stability of the levee. It is understood that USACE RIP is in the process of repairing Segment 2b from erosion on the riverside of the levee.
- Segments 2a and 2b: Due to concentration of local runoff, significant erosion gullies have formed on both the riverward and landward slopes of the levee.
- Segment 2b: There are no maintenance records which indicate that the weep holes associated with the concrete slope paving have been regularly cleaned.
- Interior Drainage System
  - Segment 2b: The inlets and outlets of some of the side-drainage structures were obstructed by debris.
  - Segment 2b: Within the past five years, the condition of each side-drainage structure has not been verified using either videotaping by television camera or other visual-inspection method.

#### **1.4 Overall Rating**

The Levee Safety Officer, Los Angeles District, has determined the overall system rating of Riverside 2 Levee to be “Unacceptable.” An “Unacceptable” system rating is defined as:

*The Periodic Inspection has identified one (or more) System Components which are rated Unacceptable and require immediate correction. The deficiency (or deficiencies) identified have resulted in an Unacceptable System rating and seriously impair the functioning of the flood protection system and pose unacceptable risk to public safety.*

The Local Sponsor will be notified of the overall rating of the levee system by letter with instructions to correct the “Unacceptable” rated items not related to the RIP repair as soon as possible. A public notification will be made regarding this levee system and the periodic inspection rating.

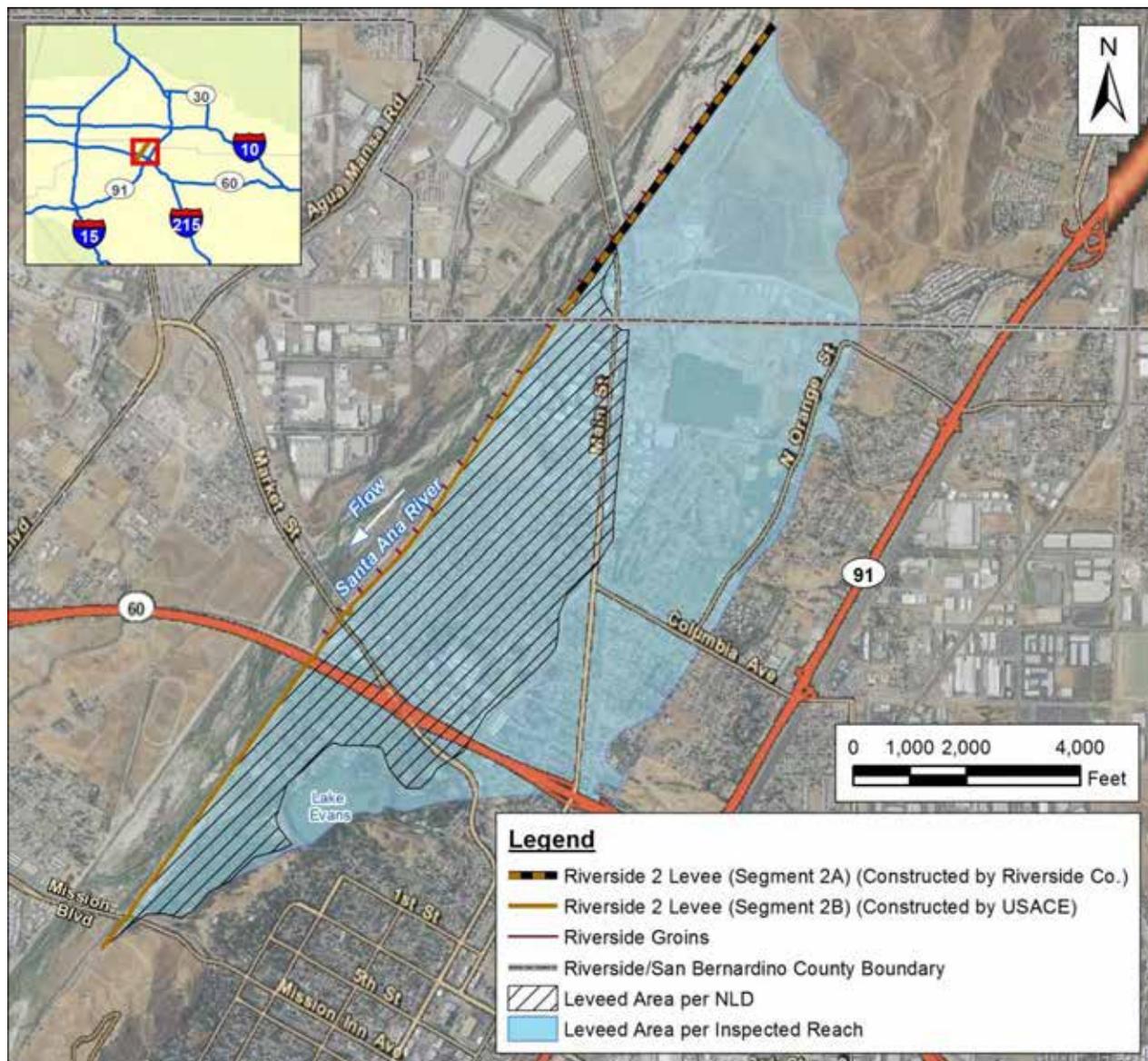


Figure 1. Riverside 2 Levee System

# *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 pro-rated.
- 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>

## Comment Letter O14

**Murray, David**

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**From:** William Lo <bl@billoconsulting.com>  
**Sent:** Monday, August 31, 2020 5:19 PM  
**To:** dbkirby@att.net  
**Cc:** Murray, David; jmorse@tbplanning.com  
**Subject:** [External] Northside Specific Plan - Planning Commission Agenda Item 4 - NSSP EIR and NSSP Documents  
**Attachments:** ROQUET RANCH.pdf; NSSP DEIR COMMENT 5-21-20

Dear Mr. Kirby,

On behalf of Sunmeadows, LLC, please find attached our letter to you regarding our opposition to the Draft Northside Specific Plan. Also attached is our letter dated May 21, 2020 referenced in the opposition.

Thank you.

Sincerely,

Bill Lo

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

September 1, 2020

Mr. Richard Kirby, Chairman, Riverside City Planning Commission  
CC David Murray, Principal Planner

Via Email

Subject: Planning Commission Agenda Item #4 – September Draft Northside Specific Plan EIR and Northside Specific Plan Documents

Dear Chairperson Kirby:

Sunmeadows, LLC. is opposed to the draft Northside Specific Plan with its' current design, which would eliminate the of extension of Orange Street from West Center Street to Pellesier Road, a road segment which is a key component of the approved Roquet Ranch Specific Plan in the City of Colton. Additionally, our May 21-2020 DEIR Comment Letters (DEIR Comment Letters O-7 and O-8, attached) identified what we believe are deficiencies in the analysis within the Draft EIR related to traffic, air quality, Greenhouse Gas emissions, noise and public safety, stemming from the proposed elimination of the Orange Street Extension.

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").

Unfortunately, the documents provided to the public for the Planning Commission Hearing on September 3, 2020 do not include a revised/updated Specific Plan document demonstrating the design/phasing changes we suggested, nor is the Response to Comment section of the EIR provided. Therefore, we are unable to determine if any changes have been made to the Project Description, the DEIR analysis or the Specific Plan design.

An environmentally superior Project could be adopted which would cure a majority of the 12 deficiencies identified in our May 22 comment letters, if the proposed Project (or any of the alternatives identified in the DPEIR) was modified to include language which preserves the Orange Street Extension or which required the construction of the full segment of Pellissier Road within the Project, prior to the elimination of the "Orange Street Extension", from West Center Street to Pellissier Road.

Therefore, we respectfully recommend the City of Riverside Planning Commission that they deny Staff's Recommendation as contained in the Staff Report, and instead recommend to the City Council that the Project be modified to preserve the "Orange Street Extension" or be modified to preserve the Orange Street Extension until such time as the segment of Pellissier Road within the Project boundaries is constructed to a minimum width acceptable to the Colton Fire Department for use as secondary access to the Roquet Ranch Specific Plan.

Sincerely,



William Lo, Managing Partner, Sunmeadows, LLC

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

May 21, 2020

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

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

Dear Mr. Eastman:

Sunmeadows, LLC. is disappointed with the need to submit this letter summarizing our concerns with the [Title]. Sunmeadows, LLC. is the developer of the adopted Roquet Ranch Specific Plan located adjacent to the 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").

**BACKGROUND:**

On May 15, 2018, the Colton City Council Amended the Land Use Plan of the Land Use Element of the City General Plan (R-037-18), and Certified the Final Environmental Impact Report (R-38-18) for the Roquet Ranch Specific Plan (RRSP). On June 5, 2018, the City of Colton adopted Ordinance 0-07-18 which amended Section 18.34.050 City Municipal Code, thereby adopting the Roquet Ranch Specific Plan. The approved RRSP consists of 754 single-family residential units, 244 townhomes, 52 active-adult attached units, 6,500 square feet of commercial retail use, a 1,500 square foot coffee shop with drive-through window, a 4,000 square foot fast-food restaurant with drive-through window, an 11.1-acre community park, and 8.4 acres of passive parks.

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

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

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

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

The Land Use Plans for both Horizon Year 2040 "Scenario One" and "Scenario Two", do not include the "Orange Street Extension" between West Center Street and Pellissier Road. According to the DPEIR, the "without Orange Street Extension" was evaluated because the construction of the planned future extension could not be guaranteed (Page 2-20), despite the fact that the adopted Roquet Ranch Specific Plan requires the extension for secondary access. The DPEIR states, without supporting evidence, that evaluation of the removal of the extension of Orange Street is considered a "conservative approach".

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

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

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

Additionally, there are numerous inconsistent and confusing references in both the text and DPEIR Figures to one or more east-west streets within the Pellissier Ranch portion of the proposed Project, which are variously and interchangeably referred to as "Old Pellissier Road", "W. Pellissier Road", "Pellissier Road", "Old Pellissier Road" (one "s"), and "New Pellissier Road" and "Pellissier Road", without clarification or clear differentiation, which makes the traffic study analysis difficult to decipher. The "Pellissier Road" name is first introduced as "Old Pellissier Road" in the text on page ES-24, and then as "W. Pellissier Road" in the text on Page 2-1. At this point the reader has no way of knowing if these are the same roadway or different roadways. Subsequently, the roadway is referred to as "W. Pellissier Road" (one "s") in Figures 2-4, 2-5, and 2-6. Then in Figure 2-7, later the same roadway appears to now be called "Pellissier Road" (one "s"), and the future Planned Secondary is inconsistently referred to as both "Pellissier Road" and "New Pellissier Road". The name changes back to "W. Pellissier Road" for Figures 2-8 and 2-9, and to "Pellissier Road" in Figure 2-11. On page 3.4-34 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 Resolution NO. R-37-18, which amended the General Plan to incorporate the Roquet Ranch Specific Plan Land Use Plan into the City of Colton General Plan Land Use Element.

**Summary of Deficiencies of the Northside Specific Plan DPEIR:**

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

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.

**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.

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,

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

William Lo,

Managing Partner, Sunmeadows, LLC.

# Northside Improvement Association

P.O. Box 244

Riverside, CA 92502



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*Organized 1912 • Oldest Community Organization in Riverside*

City of Riverside  
Planning Commission  
Re: Northside Specific Plan

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

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

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

There are a few areas of concern, however.

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

- produced from toxic materials; not what you would want in a high groundwater situation. Plus if the gels don't work, any building whether commercial or residential would be at risk from unstable ground, putting the City at risk for potential lawsuits.
- We question the wisdom of building high-density housing adjacent to the Central Park. While it would provide open space recreation to these high-density residents (who arguably need it the most), we can see it becoming an attractive nuisance for the fringe populations and the homeless after hours.
  - The PEIR clearly identifies the area of the Northside Specific Plan to be in the 100-year flood zone of both the Highgrove Channel and Springbrook Arroyo. Enhancements are suggested for containing the waters of the Highgrove Channel which is in a concrete waterway, but the natural-bottom Springbrook Arroyo is only to be widened and redirected into the Central Park area. The inundation maps on page 571 of the PEIR show the potential for flooding in the worst-case scenario across the area of the Northside Specific Plan. Any building in that zone, whether residential or commercial, would be at risk, exposing the City to massive legal action. This seems extremely short-sighted.
  - We are concerned with the continued use of the Northside Neighborhood for pass-through heavy truck traffic that is merely seeking convenient freeway access. On the one hand, it is great to know that Main Street, Center Avenue, and Columbia Avenue have all been named as 'Complete Streets' with all the enhancements that accompany that designation. However, if these circulation improvements only foster even more heavy truck traffic, how does that benefit the local residents and shoppers who have to dodge these trucks? A more comprehensive solution must be sought.

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

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

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

Peter Wohlgemuth  
President, Northside Improvement Association

# 3 Errata

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## 3.1. Introduction

All additions or correction to the Draft Program Environmental Impact Report (Draft EIR) text, tables, and figures generated either from responses to comments or independently by the City of Riverside staff are stated in this chapter of the Final EIR.

As provided in State CEQA Guidelines Section 15088(c), responses to comments may take the form of a revision to a Draft EIR or may be a separate section in the Final EIR. This section complies with the latter and provides changes to the DEIR in revision-mode text, i.e., deletions are shown with strikethrough text (~~example text~~) and additions are shown with underline text (example text). These notations are meant to provide clarification, corrections, or minor revisions as needed as a result of public comments or because of changes in the Project since the release of the DEIR as required by State *CEQA Guidelines* Section 15132. None of the corrections and additions constitute significant new information or substantial Project changes requiring recirculation, as defined by State *CEQA Guidelines* Section 15088.5.

## 3.2 Changes to the Draft Program Environmental Impact Report

The following summary will present the location and types of additions and changes or corrections made within each section of the Final EIR since the draft EIR was published.

### Executive Summary

Various mitigation measures in Table S-3, Summary of Significant Effects and Mitigation Measures, were revised based on comments received during public review, as well as internal changes made by the City of Riverside. Revised mitigation measures are shown below.

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Aesthetics</b></p> <p><b>Impact AES-1:</b> Scenic vistas may be significantly impacted associated with future development in Subarea 1 of the Northside SPA.</p> <p><b>Impact AES-CUM-1:</b> Cumulative impacts to scenic vistas from the Santa Ana River Trail would be considered cumulatively significant</p>	<p><b>MM-AES-1</b> <b>View Corridors and Recessed Facades.</b> As individual residential projects are proposed in Subarea 1, design shall preserve existing east-oriented view corridor off the Santa Ana River Trail and local topographical features such as the Box Springs Mountain Reserve Park to the extent feasible. Building design features may include recessed facades on upper floors to reduce building scale and allow for mountainous topography to remain visible from the Santa Ana River Trail and local topographical features.</p>	<p>Significant</p>
<p><b>Air Quality</b></p> <p><b>Impact AQ-1:</b> The future development allowed under the specific plan has the potential to conflict with or obstruct implementation of the applicable air quality plan (Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook).</p> <p><b>Impact AQ-CUM-1:</b> Cumulative impacts due to conflicts with regional air quality plans would be cumulatively significant</p>	<p><b>MM-AQ-1: Construction Equipment Emissions Reductions.</b> The following measures shall be incorporated to reduce construction criteria air pollutant emissions, including VOC, NO<sub>x</sub>, PM<sub>1.0</sub>, and PM<sub>2.5</sub>, generated by construction equipment used for future development projects implemented under the proposed Northside Specific Plan. Prior to the issuance of a grading permit for projects within the Northside Specific Plan, the following shall be incorporated into the grading plan:</p> <ol style="list-style-type: none"> <li>For off-road equipment with engines rated at 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> 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. 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. The grading permit shall include a condition to require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance.</li> <li>Minimize simultaneous operation of multiple construction equipment units. During construction, vehicles in loading and unloading queues shall not idle for more than 5 minutes, and shall turn their engines off when not in use to reduce vehicle emissions.</li> <li>Properly tune and maintain all construction equipment in accordance with manufacturer's specifications;</li> <li>Require construction equipment such as concrete/industrial saws, pumps, aerial lifts, material hoists, 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: <a href="https://www.forconstructionpros.com/construction-technology/article/21107531/electrified-construction-equipment-gaining-momentum">https://www.forconstructionpros.com/construction-technology/article/21107531/electrified-construction-equipment-gaining-momentum</a>.</li> <li>To reduce the need for electric generators and other fuel-powered equipment, provide on-site electrical hookups for the use of hand tools such as saws, drills, and compressors used for building construction.</li> </ol> <p>Develop a Construction Traffic Control Plan to ensure construction traffic and equipment use is minimized to the extent practicable. The Construction Traffic Control Plan shall include measures to reduce the number of large pieces of equipment operating simultaneously during peak construction periods, scheduling of vendor and</p>	<p>Significant</p>

<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.

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>haul truck trips to occur during non-peak hours, establish dedicated construction parking areas to encourage carpooling and efficiently accommodate construction vehicles, identify alternative routes to reduce traffic congestion during peak activities, and increase construction employee carpooling.</p> <p>f) 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 NO<sub>x</sub> emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, operators must 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 NO<sub>x</sub> emissions or newer, cleaner trucks and equipment. To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used, operators must maintain records of all trucks associated with the construction activities, and make these records available to the jurisdiction issuing the grading permit upon request. Alternatively, the jurisdiction may require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasible and practicable to enforce the use of specific equipment.</p> <p><b>MM-AQ-2</b> <b>Fugitive Dust Control.</b> The following measures shall be incorporated to further reduce construction fugitive dust emissions (PM10 and PM2.5), generated by grading and construction activities of future development projects implemented under the proposed Specific Plan:</p> <p>Prior to the issuance of a grading permit for projects within the Northside Specific Plan, the following shall be incorporated into the grading plan:</p> <ol style="list-style-type: none"> <li>Water or another SCAQWD-approved dust control non-toxic agent shall be utilized on the grading areas at least three times daily to minimize fugitive dust.</li> <li>All permanent roadway improvements shall be constructed and paved as early as possible in the construction process to reduce construction vehicle travel on unpaved roads. To reduce fugitive dust from earth-moving operations, building pads shall be finalized as soon as possible following site preparation and grading activities.</li> <li>Stabilize grading areas as quickly as possible to minimize fugitive dust.</li> <li>Apply chemical stabilizer, install a gravel pad, or pave the last 100 feet of internal travel path within the construction site prior to public road entry, and to on-site stockpiles of excavated material.</li> <li>Remove any visible track-out into traveled public streets with the use of sweepers, water trucks, or similar method as soon as possible.</li> <li>Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. Unpaved construction site egress points shall be graveled to prevent track-out.</li> <li>Wet wash the construction access point at the end of the workday if any vehicle travel on unpaved surfaces has occurred.</li> <li>Cover haul trucks or maintain at least 2 feet of freeboard to reduce blow-off during hauling.</li> <li>Evaluate the need for reduction in dust generating activity, potential to stop work, and/or implementation of additional dust control measures if winds exceed 25 miles per hour.</li> <li>Enforce a 15-mile-per-hour speed limit on unpaved surfaces.</li> <li>Provide haul truck staging areas for the loading and unloading of soil and materials. Staging areas shall be located away from sensitive receptors, at the furthest feasible distance.</li> <li>Construction Traffic Control Plans shall route delivery and haul trucks required during construction away from sensitive receptor locations and congested intersections, to the extent feasible. Construction Traffic Control Plans shall be finalized and approved prior to issuance of grading permits.</li> <li>Review and comply with any additional requirements of SCAQMD Rule 403.</li> </ol> <p><b>MM-AQ-3</b> <b>Architectural Coating VOC Emissions.</b> To address the impact relative to VOC emissions, Super-Compliant architectural coatings (0 grams per liter to less than 10 grams per liter VOC) shall be used during Project construction/application of paints and other architectural coatings to reduce ozone precursors. If paints</p>	

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, avoid application of architectural coatings during the peak smog season: July, August, and September. Procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1.113 (Architectural Coatings).</p> <p><b>MM-AQ-4: Encourage Electric Vehicles.</b> Future projects within the Northside Specific Plan shall comply with the following:</p> <ol style="list-style-type: none"> <li>Designate 10% of parking spaces to be for electric and alternative fuel vehicles.</li> <li>Install Level 2 EV charging stations in 6% of all parking spaces.</li> </ol> <p><b>MM-AQ-5: Idling Restriction.</b> Future projects within the Northside Specific Plan shall minimize idling time of all vehicles and equipment to the extent feasible; idling for periods of greater than five (5) minutes shall be prohibited. Signage shall be posted at truck parking spots, entrances, and truck bays advising that idling time shall not exceed five (5) minutes per idling location. To the extent feasible, future tenants shall restrict idling emission from trucks by using auxiliary power units and electrification. Each cold storage dock door shall provide electrification for transport refrigeration units (TRUs).</p> <p><b>MM-AQ-6: Energy Conservation.</b> The following energy conservation measures shall be incorporated into building plans of future projects:</p> <ol style="list-style-type: none"> <li>Install a solar photovoltaic rooftop system to reduce the electric demand from the local grid.</li> <li>Install Energy Star rated heating, cooling, lighting, and appliances.</li> <li>Outdoor lighting shall be light emitting diodes (LED) or other high-efficiency lightbulbs.</li> <li>Provide information on energy efficiency, energy efficient lighting and lighting control systems, energy management, and existing energy incentive programs to future tenants of the Northside Specific Plan.</li> <li>Non-residential structures shall meet the U.S. Green Building Council standards for cool roofs. This is defined as achieving a 3-year solar reflective index (SRI) of 64 for a low-sloped roof and 32 for a high-sloped roof.</li> <li>Outdoor pavement, such as walkways and patios, shall include paving materials with 3-year SRI of 0.28 or initial SRI of 0.33.</li> <li>Construction of modest cool roof, defined as Cool Roof Rating Council (CRR) Rated 0.15 aged solar reflectance and 0.75 thermal emittance.</li> <li>Use of Heating, Ventilation and Air Conditioning (HVAC) equipment with a Seasonal Energy Efficiency Ratio (SEER) of 12 or higher.</li> <li>Installation of water heaters with an energy factor of 0.92 or higher.</li> <li>Maximize the use of natural lighting and include daylighting (e.g., skylights, windows) in rooms with exterior walls that would normally be occupied.</li> <li>Include high-efficacy artificial lighting in at least 50% of unit fixtures.</li> <li>Install low-NOx water heaters and space heaters, solar water heaters, or tank-less water heaters.</li> <li>Use passive solar cooling/heating.</li> <li>Strategically plant trees to provide shade.</li> <li>Structures shall be equipped with outdoor electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment.</li> </ol> <p><b>MM-AQ-7: Low-VOC/Green Cleaning Product Educational Program.</b> Future tenants shall develop and implement a Low-VOC/Green Cleaning Product and Paint education program.</p> <p><b>MM-AQ-1</b>  <b>MM-AQ-2</b>  <b>MM-AQ-3</b>  <b>MM-AQ-4</b>  <b>MM-AQ-5</b>  <b>MM-AQ-6</b></p>	Significant
<p><b>Impact AQ-2:</b> Development allowed under the Specific Plan would potentially generate construction criteria air pollutant emissions in exceedance of the SCAQMD thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub>.</p>		Significant

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact AQ-CUM-2:</b> The Northside Specific Plan's contribution of air quality emissions to the SCAB would be cumulatively considerable as a result of long-term Project-related operational-source emissions, and impacts would be cumulatively significant.</p>	<p>MM-AQ-7</p>	<p>Significant</p>
<p><b>Impact AQ-3:</b> Development allowed under the Specific Plan would potentially generate operational criteria air pollutant emissions in exceedance of the SCAQMD thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub>.</p>	<p>MM-AQ-1 MM-AQ-2 MM-AQ-3 MM-AQ-4 MM-AQ-5 MM-AQ-6 MM-AQ-7</p>	<p>Significant</p>
<p><b>Impact AQ-4:</b> The Specific Plan would potentially result in a cumulatively considerable net increase of criteria pollutants for which the Specific Plan region is non-attainment under an applicable federal or state ambient air quality standard.</p>	<p>MM-AQ-1 MM-AQ-2 MM-AQ-3 MM-AQ-4 MM-AQ-5 MM-AQ-6 MM-AQ-7</p>	<p>Significant</p>
<p><b>Impact AQ-5:</b> The Specific Plan would exceed the SCAQMD mass daily thresholds of VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> during construction and/or operation, the Northside Specific Plan could have a significant impact on public health.</p>	<p>MM-AQ-1 MM-AQ-2 MM-AQ-3 MM-AQ-4 MM-AQ-5 MM-AQ-6 MM-AQ-7</p>	<p>Significant</p>
<p><b>Impact AQ-6:</b> Future development allowed under the Specific Plan would generate NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions in excess of site-specific LSTs; and those localized construction emissions would impact nearby sensitive receptors.</p>	<p>MM-AQ-1 MM-AQ-2 MM-AQ-3 MM-AQ-4 MM-AQ-5 MM-AQ-6 MM-AQ-7</p>	<p>Significant</p>
<p><b>Impact AQ-CUM-3:</b> The Northside Specific Plan's contribution of impacts to sensitive receptors would be cumulatively considerable.</p> <p><b>Impact AQ-7:</b> The Specific Plan would potentially result in the exposure of sensitive receptors to construction-generated TAC emissions.</p>	<p>MM-AQ-1 MM-AQ-2 MM-AQ-3</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact AQ-8:</b> The Specific Plan would potentially result in the exposure of sensitive receptors to operational-generated TAC emissions.</p>	<p><b>Mitigation Measure(s)</b>  <b>MM-AQ-1</b>  <b>MM-AQ-2</b>  <b>MM-AQ-3</b>  <b>MM-AQ-8: Health Risk Siting.</b> Future projects shall minimize exposure of new sensitive receptors to toxic air contaminants (TACs), to the extent possible, and consider distance, orientation, and wind direction when siting TAC-emitting sources near sensitive land uses to minimize exposure and associated health risk.  <b>MM-AQ-9: Toxic Air Contaminant Reduction.</b> Prior to the approval of a use that would generate new sources of TAC emissions (i.e., light industrial, distribution centers, gasoline dispensing facilities, dry cleaners) in close proximity to existing sensitive land uses, require development projects to implement applicable best management practices, as necessary and feasible, that will reduce exposure to TACs. Specific reduction measures will be evaluated and determined depending on proposed land use TAC sources and feasibility.  <b>MM-AQ-10: Health Risk Assessment Requirements.</b> Consistent with the California Air Resources Board's recommendations on siting new sensitive land uses, a formal health risk assessment shall be performed for future projects if the following conditions apply:                      a) <b>Distribution Centers.</b> 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. In addition, configuration of entry and exit points of the distribution center shall be considered to minimize exposure to sensitive receptors.                      b) <b>Gasoline Dispensing Facilities.</b> For any large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) within 300 feet of a sensitive receptor.                      c) <b>Dry Cleaners Using Perchloroethylene.</b> For any dry cleaning operation within 300 feet of a sensitive receptor. For operations with three or more machines, consult with the South Coast Air Quality Management District for when a health risk assessment shall be prepared as the distance to the closest sensitive receptor may be less than 300 feet.                      d) <b>Other Sources of Toxic Air Contaminants.</b> For other sources of TACs, the City shall evaluate the need to prepare a health risk assessment based on the types of TACs and the distance to sensitive receptors. This includes requiring a health risk assessment to for any development proposing to site sensitive receptors within 500 feet of a freeway that has 100,000 vehicles on an average day in accordance with CARB requirements.</p>	<p>Significant</p>
<p><b>Impact AQ-9:</b> The Specific Plan would potentially result in the health effects from criteria air pollutants.</p>	<p><b>MM-AQ-1</b>  <b>MM-AQ-2</b>  <b>MM-AQ-3</b>  <b>MM-AQ-4</b>  <b>MM-AQ-5</b>  <b>MM-AQ-6</b>  <b>MM-AQ-7</b>  <b>MM-AQ-11: Odor Siting.</b> Future land uses that have the potential to generate objectionable odors shall be located as far away as possible and/or downwind from sensitive receptors.  <b>MM-AQ-12: Odor Abatement Plan.</b> Any odor generated by a land use shall implement an Odor Abatement Plan (OAP). The OAP shall include the following:                      a) Name and telephone number of contact person(s) at the facility responsible for logging in and responding to odor complaints.                      b) Policy and procedure describing the actions to be taken when an odor complaint is received, including the training provided to the staff on how to respond.                      c) Description of potential odor sources at the facility.                      d) Description of potential methods for reducing odors, including minimizing idling of delivery and service trucks and buses, process changes, facility modifications, and/or feasible add-on air pollution control equipment.                      e) Contingency measures to curtail emissions in the vent of a public nuisance complaint.</p>	<p>Significant</p>
<p><b>Biological Resources</b>  <b>Impact BIO-1a:</b> Development outside of the MSHCP would result in potentially significant direct impacts to special-status plant species.</p>	<p><b>MM-BIO-1a: Special-Status Plant Habitat Assessment, Focused Surveys, and Mitigation.</b>  <b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</b> Prior to ground disturbance or issuance of a grading permit involving projects on undeveloped lands in the Northside Neighborhood and Pellissier Ranch 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 shall be conducted by a Qualified</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact BIO-1b:</b> Development allowed under the Northside Specific Plan within the MSHCP would result in potentially significant direct impact special-status plants.</p> <p><b>Impact BIO-CUM-1:</b> When considered in the context of other development projects in the cumulative biological study area, these impacts could result in cumulatively considerable significant direct impacts to special-status plant species within the MSHCP.</p>	<p>Biologist. If there are special-status plants, then mitigation shall be required. If State-listed plants have the potential to be impacted, the applicant shall apply for Incidental Take Permit through the California Department of Fish and Wildlife for authorization of those impacts.</p> <p>For special-status plants, if 100% of the area with the species cannot be avoided, then mitigation, in the form of mitigation credits or land acquisition and conservation, would be required. Agency-approved Habitat mitigation credits or occupied replacement lands shall be purchased shall be at a minimum 3:1 ratio (acres mitigated acres impacted).</p>	
<p><b>MM-BIO-1b:</b> Special-Status Plant Habitat Assessment, Focused Surveys, and Mitigation.</p> <p><b>Inside the MSHCP:</b> The federally and state-listed species that have a low potential to occur in the SPA in the MSHCP are covered under the MSHCP, and "take" coverage and measures are included in the MSHCP as long as species-specific requirements are met. Additionally, non-listed special-status plants with a moderate potential to occur are also covered under the MSHCP and mitigated by complying with the MSHCP.</p> <p>Approximately 180 acres of the SPA lies with Narrow Endemic Plant Species Survey Area (NEPSSA) No. 7. Future development in NEPSSA No. 7 would require a habitat assessment for San Diego ambrosia (low potential to occur), Brand's phacelia (not expected to occur), and San Miguel savory (low potential to occur) (Figure 3.3-4; Western Riverside MSHCP). Therefore, a site-specific habitat assessment shall be required for all future development in the 180-acre portion of the SPA in NEPSSA No. 7 prior to construction. If a suitable habitat is found, a focused rare plant survey must be completed when the NEPSSA No. 7 species would be visible. Where survey results are positive for Narrow Endemic Plant Species, any future development with the potential to affect Narrow Endemic Plant Species shall be subject to avoidance of 90% of those portions of the project site that provide for long-term conservation value of the identified Narrow Endemic Plant Species until it is demonstrated that conservation goals for the particular species are met. Equivalency findings must be made as described in Section 6.3.2 of the MSHCP. If it is determined that the 90% threshold cannot be met and achievement of overall MSHCP conservation goals for the particular species have not yet been demonstrated, then the applicant must prepare a determination of biologically equivalent or superior preservation (DBESP) document that will include measures to reduce significant impacts similar to those as described for areas outside the MSHCP. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife as described in the Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future California Environmental Quality Act document approvals. Once the DBESP is approved, the applicant shall implement the DBESP measures. No additional surveys or further measures are required for special-status plants in the MSHCP.</p>	<p>Significant</p>	<p>Significant</p>
<p><b>Impact BIO-2:</b> Construction-related activities (i.e., generation of fugitive dust, changes in hydrology, release of chemical pollutants, etc.) would potentially result in short-term or temporary significant indirect impacts to special-status plant species.</p>	<p><b>MM-BIO-1a</b> <b>MM-BIO-1b</b></p> <p><b>MM-BIO-2: Standard Best Management Practices (BMPs).</b> Prior to ground disturbance or issuance of a grading or construction permit within the Northside Specific Plan undeveloped lands or within 500 feet of such lands (including projects adjacent to the Santa Ana River), the following BMPs shall be included on grading and construction plans notes. The applicable jurisdiction (i.e., City of Colton, City of Riverside, or County of Riverside) shall have the right to access and inspect any sites of approved projects, including any restoration/enhancement area for compliance with project approval conditions including these BMPs. Within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), these measures are also consistent with MSHCP Volume I, Appendix D.</p> <p><b>Lighting</b></p> <ul style="list-style-type: none"> <li>Within 500 feet of the suitable habitat for special-status wildlife, construction performed outside the hours of 7:00 p.m. and 7:00 a.m. on weekdays and outside the hours of 5:00 p.m. and 8:00 a.m. on Saturdays (per the City's Title 7 - Noise Control ordinances) shall use minimal illumination in order to perform the work safely. All lighting shall be directed downward and shielded to focus illumination on the desired work areas only, and to prevent light spillage onto adjacent habitat.</li> </ul> <p><b>Debris/Pollution</b></p> <ul style="list-style-type: none"> <li>Fully covered trash receptacles that are animal-proof will be installed and used during construction to contain all food, food scraps, beverage containers, and other miscellaneous trash. Trash contained within the receptacles will be removed at least once a week from the project site.</li> <li>No litter, construction materials, or debris will be discharged into jurisdictional waters or MSHCP riparian/riverine sources.</li> <li>Construction work areas shall be kept clean of debris, trash, and construction materials.</li> </ul> <p><b>Measures to Avoid Impacts to Streambed and Water Quality</b></p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
	<ul style="list-style-type: none"> <li>• Erodi- ble fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.</li> <li>• Projects shall be designed to avoid the placement of equipment and personnel within the stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern, as feasible. Projects that cannot be conducted without placing equipment or personnel in sensitive habitats shall be timed to avoid the breeding season of riparian species.</li> <li>• When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing or other sediment trapping materials shall be installed at the downstream end of construction activity to minimize the transport of sediments off site. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from reentering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream.</li> <li>• Water pollution and erosion control plans shall be developed and implemented in accordance with Regional Water Quality Control Board (RWQCB) requirements as described in Northside Specific Plan Program Environmental Impact Report <b>CM-HVD-1</b>.</li> </ul> <p><b>Vehicle and Equipment Restrictions and Maintenance</b></p> <ul style="list-style-type: none"> <li>• Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas, other sensitive habitats, and jurisdictional waters of the United States/state. These designated areas shall be located in such a manner as to prevent any runoff from entering these sensitive habitats. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials shall be reported to appropriate entities including but not limited to applicable jurisdictional city or County, U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and/or RWQCB and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.</li> </ul> <p><b>Environmental Awareness Training and Biological Monitoring</b></p> <p><b>Worker Environmental Awareness Program (WEAP) and Ongoing Training</b></p> <p>Prior to grading, a preconstruction meeting shall be required that includes a training session for project personnel by a qualified biologist. The training shall include: (1) a description of the species of concern and its habitats; (2) the general provisions of the applicable regulations pertaining to biological resources, including the Endangered Species Act and the MSHCP; (3) the need to adhere to the provisions of the Endangered Species Act and the MSHCP and other applicable regulations; (4) the penalties associated with violating the provisions of the Endangered Species Act and other applicable regulations; (5) the general measures that are being implemented to conserve the species of concern as they relate to the project; and (6) the access routes to and project site boundaries within which the project activities must be accomplished.</p> <p>Additionally, WEAP shall include the measures and mitigation requirements for the applicable resources. Copies of the mitigation measures and any required permits from the resource agencies shall be made available to construction personnel.</p> <p>A training program, such as training video, coordinated by the project biologist, may also be used.</p> <p><b>Biological Monitoring and Compliance Documentation</b></p> <p>A qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat, species of concern, and other sensitive biological resources outside the project footprint.</p> <p><b>Minimization of Disturbance</b></p> <ul style="list-style-type: none"> <li>• The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.</li> <li>• The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species.</li> <li>• The upstream and downstream limits of project disturbance plus lateral limits of disturbance on either side of the stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work.</li> <li>• Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction</li> </ul>	

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact BIO-3:</b> Development-related activities (i.e., increased invasive plant species, trampling, soil compaction, etc.) would result in potential long-term significant indirect impacts to special-status plants.</p>	<p>limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.</p> <p><b>Exotic Species</b></p> <ul style="list-style-type: none"> <li>Exotic species that prey upon or displace target species of concern shall be permanently removed from the site to the extent feasible.</li> </ul> <p><b>MM-BIO-3: Restoration of Temporary Impacts to Uplands with Non-Invasive Species.</b> Prior to ground disturbance or issuance of a grading or construction permit of projects within the Northside Specific Plan on undeveloped lands, grading and construction plans shall include the following note regarding temporary impacts to uplands:</p> <p>Site construction areas subjected to temporary ground disturbance in undeveloped areas (disturbance activity), and revegetated with an application of a native seed mix, if necessary, prior to or during seasonal rains to promote passive restoration of the area to pre-project conditions (except that no invasive plant species will be restored). An area subjected to “temporary” disturbance means any area that is disturbed but will not be subjected to further disturbance as part of the project. If any grading occurred in areas intended to remain undeveloped, the site will be recontoured to natural grade. This measure does not apply to situations in urban/developed areas that are temporarily impacted and will be returned to an urban/developed land use. Prior to seeding temporary ground disturbance areas, the project biologist will review the seeding palette to ensure that no seeding of invasive plant species, as identified in the most recent version of the California Invasive Plant Inventory for the region, will occur.</p> <p><b>MM-BIO-4: Avoidance/Minimization of Long-term Indirect Impacts to Special-Status Species.</b> Prior to ground disturbance or issuance of a construction permit within 500 feet of suitable habitat for special-status species (including the Santa Ana River) with potential to occur in the Specific Plan Area (SPA), construction plans and conditions of approval shall include the following to address indirect impacts to special-status species:</p> <p><b>Drainage:</b> Future development within 500 feet of suitable habitat for special-status species shall incorporate measures, including measures required through the National Pollutant Discharge Elimination System requirements, to ensure that the quantity and quality of runoff discharged is not altered in an adverse way when compared with existing conditions. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into suitable habitat for special-status species. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, or other elements that might degrade or harm biological resources or ecosystem processes. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. Regular maintenance shall occur to ensure effective operations of runoff control systems.</p> <p><b>Toxics:</b> Future proposed projects that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharges. Measures such as those employed to address drainage issues shall be implemented.</p> <p><b>Lighting:</b> Night lighting shall be directed away from suitable habitat for special-status species to protect species from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting is not increased. Energy-efficient LPS or HPS lamps shall be used exclusively to dampen glare, in accordance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), where applicable.</p> <p><b>Noise:</b> Proposed noise-generating land uses affecting suitable habitat for special-status species shall incorporate setbacks, berms, or walls to minimize the effects of noise on resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards. For planning purposes, wildlife should not be subject to noise that would exceed residential noise standards.</p> <p><b>Invasives:</b> When approving landscape plans for future development, invasive, non-native plant species listed on the most recent California Invasive Plant Council Inventory (<a href="https://www.cal-ipc.org/plants/inventory/">https://www.cal-ipc.org/plants/inventory/</a>) with a rating of moderate or high shall not be included in landscaping. For future development within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), invasive, non-native species listed in MSHCP Section 6.1.4, Table 6-2, will also be prohibited in landscaping.</p> <p><b>Barriers:</b> Future development shall incorporate barriers, where appropriate in individual project designs, to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in suitable habitat for special-status wildlife. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage, and/or other appropriate mechanisms.</p>	<p>Significant.</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact BIO-4a:</b> Development allowed under the Northside Specific Plan within undeveloped areas would potentially result in significant direct impacts to San Bernardino kangaroo rat and Stephens' kangaroo rat.</p>	<p><b>Grading/Land Development:</b> Manufactured slopes associated with future development within the SPA shall not extend into the Santa Ana River or other suitable habitat for special-status species that would be avoided and/or conserved.</p> <p><b>MM-BIO-5a: San Bernardino Kangaroo Rat, Stephens' Kangaroo Rat, and Los Angeles Pocket Mouse Mitigation.</b></p> <p><b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</b> Prior to ground disturbance or issuance of grading permits for projects within the Northside Specific Plan areas outside of the MSHCP on undeveloped lands, a CDFW-approved qualified biologist shall conduct pre-construction trapping surveys within suitable habitat to determine presence of SBKR, Los Angeles pocket mouse, and Stephens' 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. 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 San Bernardino kangaroo rat or Stephens' kangaroo rat is present on the site, an incidental take permit and mitigation at no less than 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.</p>	<p>Significant</p>
<p><b>Impact BIO-4b:</b> Development allowed under the Northside Specific Plan within the MSHCP would potentially result in significant direct impacts to Los Angeles pocket mouse, San Bernardino kangaroo rat, and Stephens' kangaroo rat.</p>	<p><b>MM-BIO-5b: San Bernardino Kangaroo Rat, Stephens' Kangaroo Rat, and Los Angeles Pocket Mouse Mitigation.</b></p> <p><b>Inside of the MSHCP.</b> Approximately 12 acres of the SPA are located with the San Bernardino kangaroo rat and Los Angeles pocket mouse survey area. Prior to construction, any future development in the MSHCP San Bernardino kangaroo rat and Los Angeles pocket mouse survey area would require a habitat assessment and focused surveys, if suitable habitat is present. There is no official survey protocol (assessment and trapping) required in the MSHCP; however, the MSHCP Biological Monitoring Program has developed and refined a survey protocol that should be used as a guide to assess if adequate Los Angeles pocket mouse and San Bernardino kangaroo rat surveys have been conducted (refer to Los Angeles pocket mouse and San Bernardino kangaroo rat Survey Reports at the MSHCP website: <a href="http://wrc-rca.org/about-rca/monitoring/monitoring-surveys/">http://wrc-rca.org/about-rca/monitoring/monitoring-surveys/</a>). If presence of San Bernardino kangaroo rat or Stephens' kangaroo rat is known or assumed to occur on the project site located inside 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.</p> <p>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 and equivalency findings shall be made as described in the Section 6.3.2 of the MSHCP. If the 90% avoidance threshold cannot be met, then the applicant must prepare a determination of biological equivalent or superior preservation (DBESP) document that proposes on measures to reduce significant impacts to these species similar to those described for other small mammals in areas outside the MSHCP. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, USFWS, and CDFW as described in the Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future CEQA document approvals. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of approval, as applicable. The SPA does not overlap with Stephens' kangaroo rat Core Reserve Areas designated in the SKR Habitat Conservation Plan (SKR HCP) but is located within the SKR HCP fee area. As a covered species, "take" of this species would be authorized within the SPA. Also, the applicant must pay the standard SKR HCP Development Mitigation Fee.</p>	<p>Significant</p>
<p><b>Impact BIO-5a:</b> Development allowed under the Northside Specific Plan within undeveloped areas would potentially result in significant direct impacts to listed fairy shrimp.</p>	<p><b>MM-BIO-6a: Vernal Pools and Fairy Shrimp Habitat Assessment, Focused Surveys, and Mitigation.</b> Prior ground disturbance or issuance of a grading permit for projects on undeveloped sites within the Northside Specific Plan, a habitat assessment shall be conducted by a Qualified Biologist to determine whether there are vernal pools or other habitat suitable for fairy shrimp present on the site. If there is suitable habitat, then fairy shrimp surveys must be conducted pursuant to USFWS Survey Guidelines for the Listed Large Branchiopods (USFWS 2019b). If the first survey is negative for listed fairy shrimp, then an additional season (wet or dry, whichever one wasn't already conducted) of surveys shall be completed as well. If presence of listed fairy shrimp is known or assumed to occur on the project site, the following measures shall be noted on the grading plan prior to grading permit issuance and required to be implemented by the applicant.</p> <p><b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</b> Based on the Qualified Biologist assessment and surveys for listed fairy shrimp, creation and/or enhancement of suitable habitat for the applicable species of fairy shrimp shall be required at a minimum ratio of 2:1. This effort shall include salvage of fairy shrimp cysts from impacted habitat and relocation into the created and/or enhanced suitable habitat. The created and/or enhanced suitable habitat shall be conserved via a conservation easement or other method approved by the U.S. Fish and Wildlife (USFWS). Prior to the issuance of a grading permit, a take permit from the USFWS shall be obtained as described in Northside Specific Plan Program Environmental Impact Report CM-BIO-1, and measures may be refined with further input from the USFWS.</p>	<p>Significant</p>
<p><b>Impact BIO-5b:</b> Development allowed under the Northside Specific Plan within</p>	<p><b>MM-BIO-6b: Vernal Pools and Fairy Shrimp Habitat Assessment, Focused Surveys, and Mitigation.</b> Prior ground disturbance or issuance of a grading permit on undeveloped sites within the Northside Specific Plan, a habitat assessment shall be conducted by a Qualified Biologist to determine whether there are vernal pools or other habitat suitable for fairy shrimp present on the site. If there is suitable habitat, then fairy shrimp surveys must be conducted pursuant to USFWS Survey Guidelines for the Listed Large Branchiopods (USFWS</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p>the MSHCP would potentially result in significant direct impacts to listed fairy shrimp.</p>	<p>2019b). If the first survey is negative for listed fairy shrimp, then an additional season (wet or dry, whichever one wasn't already conducted) of surveys shall be completed as well. If presence of listed fairy shrimp is known or assumed to occur on the project site, the following measures shall be noted on the grading plan prior to grading permit issuance and required to be implemented by the applicant.</p> <p><b>Inside of the MSHCP:</b> Based on the Qualified Biologist assessment and surveys for listed fairy shrimp, 90% of the habitat with long-term conservation value must be avoided. If the 90% avoidance threshold cannot be met, then the applicant must prepare a determination of biological equivalent or superior preservation (DBESP) document and would propose measures similar to those applicable to areas outside of the MSHCP. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, USFWS, and California Department of Fish and Wildlife as described in the Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future California Environmental Quality Act document approvals. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p>	<p>Significant</p>
<p><b>Impact BIO-6a:</b> Development allowed under the Northside Specific Plan within undeveloped areas would potentially result in significant direct impacts to coastal California gnatcatcher.</p>	<p><b>MM-BIO-7a: Coastal California Gnatcatcher Surveys.</b></p> <p><b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).</b> Prior ground disturbance or issuance of a grading permit on undeveloped sites within the Northside Specific Plan a Qualified Biologist shall conduct a habitat assessment for coastal California gnatcatcher (<i>Poliopelia californica californica</i>). If there is suitable habitat for coastal California gnatcatcher present, a focused protocol-level survey using the most recent U.S. Fish and Wildlife Service (USFWS) protocol for the species, which is currently Coastal California Gnatcatcher Presence/Absence Survey Guidelines (USFWS 1997). If presence of coastal California gnatcatcher 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.</p> <p>Based on the Qualified Biologist assessment and surveys for coastal California gnatcatcher, suitable habitat for the species must be conserved at a minimum of a 2:1 ratio, depending on the quality of habitat impacts and the quality of habitat conserved determined to be present by the Qualified Biologist. No clearing, grubbing, grading, or other construction activities shall occur during the coastal California gnatcatcher breeding season (March 1 to August 15). If construction activities cannot be completed outside coastal California gnatcatcher breeding season, then a pre-construction survey shall be conducted in all areas of suitable habitat, by a Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) Recovery Permit). If found during pre-construction surveys, a 500-foot buffer will be required around the nest site. Additionally, prior to issuance of a grading permit on undeveloped sites with confirmed presence of coastal California gnatcatcher, a take permit from the USFWS would be required as described in Northside Specific Plan Program Environmental Impact Report CM-BIO-1 and measures may be refined with future input from the USFWS.</p>	<p>Significant</p>
<p><b>Impact BIO-6b:</b> Development allowed under the Northside Specific Plan within the MSHCP would potentially result in significant direct impacts to coastal California Gnatcatcher.</p>	<p><b>MM-BIO-7b: Coastal California Gnatcatcher Surveys.</b></p> <p><b>Inside of the MSHCP.</b> Coastal California gnatcatcher is a covered species under the MSHCP, and no additional surveys are required for areas inside the MSHCP. Direct impacts to nesting coastal California gnatcatchers would be avoided through implementation of nesting bird surveys and seasonal restrictions on occupied habitat removal, as described in <b>MM-BIO-13</b>.</p>	<p>Significant</p>
<p><b>Impact BIO-7a:</b> Development allowed under the Northside Specific Plan within undeveloped areas would potentially result in significant direct impacts to non-listed special-status species, depending on the location and size.</p> <p><b>Impact BIO-CUM-3:</b> in combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative direct impact to non-listed special-status species outside of the MSHCP.</p>	<p><b>MM-BIO-8a: Burrowing Owl Pre-Construction Surveys and Avoidance Measures.</b></p> <p><b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).</b> Prior to ground disturbance or issuance of a grading permit on undeveloped sites outside of the MSHCP within the Northside Neighborhood and Pellissier Ranch 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, then breeding seasons 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 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 2:1 ratio. In addition, following measures shall be completed prior to grading permit issuance outside of the MSHCP.</p> <p>No less than 14 days prior to ground-disturbing activities (vegetation clearance, grading), a Qualified Biologist (i.e., a wildlife biologist with previous burrowing owl survey experience) shall conduct pre-construction take avoidance surveys on and within 200 meters (656 feet) of the construction zone to identify occupied breeding or wintering burrowing owl burrows. The take avoidance burrowing owl surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW 2012) and shall consist of walking parallel transects 7 to 20 meters apart, adjusting for vegetation height and density as needed, and noting any burrows with fresh burrowing owl sign or presence of burrowing owls. Copies of the burrowing owl survey results shall be submitted to the California Department of Wildlife (CDFW) and the City of Colton.</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact BIO-CUM-6:</b> in combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative impact to these species: California legless lizard (SSC), California glossy snake (SSC), coast patch-nosed snake (SSC), pallid bat (SSC), pallid San Diego pocket mouse (SSC), western yellow bat (SSC), and pocketed free-tailed bat (SSC).</p>	<p>If burrowing owls are detected on site, no ground-disturbing activities shall be permitted within 200 meters (656 feet) of an occupied burrow. A smaller buffer may be established if the qualified biologist determines a reduced buffer would not adversely affect the burrowing owl(s).</p> <p>If avoidance of active burrows is infeasible, a qualified biologist shall 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. 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 of 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.</p> <p><b>MM-BIO-9 Special-Status Wildlife Habitat Assessment, Pre-Construction Sweep, and Monitoring</b></p> <p><b>Habitat Assessment.</b> Prior to ground disturbance or issuance of a grading permit on undeveloped sites outside of the Western Riverside County Multiple Species Conservation Plan (MSHCP) within the Northside Specific Plan, a habitat assessment for the potential for special-status wildlife to occur shall be conducted by a Qualified Biologist. If there is suitable habitat for special-status wildlife, then the project grading plan shall list and the applicant shall implement the following pre-construction sweep and monitoring measures to minimize or avoid impacts to special-status wildlife species.</p> <p><b>Pre-Construction Sweep.</b> Prior to ground disturbance or initiation of clearing, grading or construction, a Qualified Biologist shall conduct a daily pre-construction survey sweep within areas of suitable habitat for special-status species wildlife. The Qualified Biologist shall look for special-status species that may be located within or immediately adjacent to (within 500 feet of) the project work areas, as permitted by access. Any individual special-status wildlife species observed within the project work areas during the pre-construction survey will be flushed or moved out of harm's way to avoid direct impacts to these species. If a population of special-status wildlife are observed during the pre-construction survey and cannot be avoided by the project, additional measures may be required as determined through consultation with the California Department of Fish and Wildlife (CDFW). Additional measures may include seasonal restrictions (e.g., if burrowing owl nesting burrows are identified and cannot be avoided), relocation of the species, and/or compensatory habitat-based mitigation at a minimum 1:1 ratio for the loss of occupied habitat (in which the open space areas to remain post-construction could be counted toward the overall compensatory mitigation requirements, as applicable).</p> <p><b>Monitoring.</b> A Qualified Biologist shall be present to monitor vegetation removal and topsoil salvaging and stockpiling immediately adjacent to or within suitable habitat. The Qualified Biologist shall possess an appropriate California scientific collecting permit to handle special-status species likely to occur in the project area. If special-status wildlife species are detected in the work area during the monitoring effort, the authorized Qualified Biologist will capture and relocate individuals to nearby undisturbed areas with suitable habitat outside of the construction area, but as close to their origin as possible. All special-status wildlife moved or flushed during project activities will be documented by the biologist on site and provided to San Bernardino and Riverside Counties and/or CDFW upon completion of construction and prior to the issuance of occupancy permits.</p>	<p>Significant.</p>
<p><b>Impact BIO-7b:</b> Development allowed under the Northside Specific Plan within the MSHCP would potentially result in significant direct impacts to non-listed special-status species.</p>	<p><b>MM-BIO-8b Burrowing Owl Pre-Construction Surveys and Avoidance Measures</b></p>	<p>Significant.</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
	<p><b>Inside of the MSHCP:</b> Approximately 252 acres of the SPA are located within the MSHCP burrowing owl survey area. Prior to ground disturbance or issuance of a grading permit within the MSHCP burrowing owl survey area, a habitat assessment and focused surveys, if suitable habitat is present, shall be completed. All burrowing owl surveys must be conducted in accordance with the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area (RCA 2006). If other methodologies are followed (e.g., CDFG 2012), the Qualified Biologist shall provide further justification regarding why the survey methods implemented yielded optimal results even when the accepted protocol was not followed. Methodology shall be separated into discussions for Step I (habitat assessment), Step II-A (focused burrow survey), and Step II-B (focused burrowing owl surveys), as applicable.</p> <p>If burrowing owl are confirmed present on the project site, 90% of those portions of the site that provide for long-term conservation value for the burrowing owl shall be avoided, and equivalency findings shall be made as described in the Section 6.3.2 of the MSHCP as feasible prior to the issuance of a grading permit. If the 90% avoidance threshold cannot be met, then the application must prepare a determination of biological equivalent or superior preservation (DBESP) document that proposes measures, such as buffers similarly described for areas outside of the MSHCP. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, U.S. Fish and Wildlife Service (USFWS), and CDFW as described in Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future California Environmental Quality Act document approvals. Additionally, the applicant would be required to prepare a Burrowing Owl Protection and Relocation Plan. This plan would need to be coordinated with, and reviewed and approved by the USFWS and CDFW, including the state banding permit office and federal Migratory Bird Treaty Act office if active relocation is needed, prior to initiating any site-disturbing activities. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p> <p><b>Pre-Construction Survey:</b> Within all 252 acres of the SPA located within the MSHCP burrowing owl survey area, regardless of survey results, a pre-construction survey shall be conducted for burrowing owl in accordance with the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area (RCA 2006). In accordance with these instructions, this survey would occur within 30 days prior to ground-disturbance activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, grading, equipment staging.). A minimum of one survey site visit within the described time frame prior to any site disturbance (e.g., vegetation clearing and grubbing, tree removal, site watering, equipment staging, grading) is required to confirm presence or absence of owls on the site. Pre-construction surveys shall be conducted by a qualified biologist. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl have not colonized the site since it was last disturbed. If burrowing owl are found, the same coordination described above will be necessary. If burrowing owl are present within the survey area, take of owls and active nests shall be avoided as determined by a qualified biologist.</p>	
<p><b>Impact BIO-5a:</b> Development allowed under the Northside Specific Plan within undeveloped areas would potentially result in significant direct impacts to burrowing owls.</p>	<p><b>MM-BIO-9</b> <b>MM-BIO-8a</b> <b>MM-BIO-9</b></p>	<p>Significant</p>
<p><b>Impact BIO-5b:</b> Development allowed under the Northside Specific Plan within the MSHCP would potentially result in significant direct impacts to burrowing owls.</p>	<p><b>MM-BIO-5b</b> <b>MM-BIO-6b</b> <b>MM-BIO-8b</b></p>	<p>Significant</p>
<p><b>Impact BIO-9:</b> Construction-related activities (i.e., fugitive dust, noise and vibrations, increased human presence, night-time lighting, etc.) would result in potential short-term or temporary</p>	<p><b>MM-BIO-2</b> <b>MM-BIO-3</b> <b>MM-BIO-13: Nesting Bird Surveys.</b></p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p>indirect significant impacts to special-status wildlife species.</p> <p><b>Impact BIO-CUM-7:</b> In combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative indirect construction-related impacts to special-status wildlife species and suitable habitat for special-status wildlife species.</p>	<p>Prior to ground disturbance or issuance of a grading or construction permit on undeveloped sites or sites within 500 feet of undeveloped areas, the grading plans and construction plans shall state the following nesting bird requirements.</p> <p>A Qualified Biologist shall conduct pre-construction surveys no earlier than 14 days prior to any on-site grading and construction that may occur during the nesting/breeding season of special-status bird species. Pre-construction nesting bird surveys shall also need cover a 500-foot buffer around the site. The pre-construction surveys shall be conducted between March 1 and September 1, or as determined by the Qualified Biologist.</p> <p>If occupied nests are found, then limits of construction to avoid occupied nests shall be established by the Qualified Biologist in the field with flagging, fencing, or other appropriate barriers (e.g., 250 feet around active passerine nests to 500 feet around active non-listed raptor nests), and construction personnel shall be instructed on the sensitivity of nest areas. The Qualified Biologist shall serve as a construction monitor during those periods when construction activities are to occur near nest areas to avoid inadvertent impacts to these nests. The Qualified Biologist may adjust the 250-foot or 500-foot setback at his or her discretion depending on the species and the location of the nest (e.g., if the nest is well protected in an area buffered by dense vegetation). Once the Qualified Biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, construction may proceed in the setback areas. If nesting raptors or migratory birds are not detected during the pre-construction survey, no further measures shall be required, and construction activities may proceed.</p>	<p>Significant</p>
<p><b>Impact BIO-10:</b> Development-related activities (i.e., changes in hydrology or water quality, introduction of toxic chemicals from adjacent land use, nighttime lighting, trampling, etc.) would result in potential long-term indirect significant impacts to special-status wildlife.</p> <p><b>Impact BIO-CUM-8:</b> In combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative indirect impact to special-status wildlife species.</p>	<p><b>MM-BIO-4</b></p>	<p>Significant</p>
<p><b>Impact BIO-CUM-2:</b> In combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative direct impact to special-status wildlife species outside of the MSHQP.</p>	<p><b>MM-BIO-5</b> <b>MM-BIO-6</b> <b>MM-BIO-7</b></p>	<p>Significant</p>
<p><b>Impact BIO-CUM-4:</b> in combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative direct impact to special-status wildlife species inside of the MSHQP.</p>	<p><b>MM-BIO-9</b></p>	<p>Significant</p>
<p><b>Impact BIO-CUM-5:</b> in combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative impact to</p>	<p><b>MM-BIO-5</b> <b>MM-BIO-6</b> <b>MM-BIO-8</b></p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p>burrowing owls and Riverside fairy shrimp.</p> <p><b>Impact BIO-11a:</b> Development within the Specific Plan Area (SPA) and outside of the MSHCP would result in potential significant direct impacts to sensitive vegetation communities.</p>	<p><b>MM-BIO-11a: Sensitive Vegetation Communities. Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</b> Prior to ground disturbance or issuance of a grading permit on undeveloped sites outside the MSHCP within the Northside Specific Plan City of Colton area, a Qualified Biologist shall conduct vegetation mapping within the proposed project site. The Qualified Biologist will determine if there is a sensitive natural community per the California Department of Fish and Wildlife (CDFW 2019) present on site. If there is a sensitive natural community on site, and the community cannot be avoided, the impact must be mitigated at not less than a 1:1 ratio through conservation of the same vegetation community either on site, off site, or through an approved mitigation bank. The mitigation site shall be fenced and preserved. If on-site preservation occurs, non-native plant species listed on the most recent California Invasive Plant Council inventory (<a href="https://www.cal-ipc.org/plants/inventory/">https://www.cal-ipc.org/plants/inventory/</a>) with a rating of moderate or high shall not be included in proposed landscaping. A sensitive habitat mitigation proposal will be provided by the applicant via a Qualified Biologist and approved by the City of Colton prior to the issuance of a grading permit. The sensitive habitat mitigation plan shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p> <p><b>MM-BIO-11b: Sensitive Vegetation Communities. Inside of the MSHCP:</b> For future development in the Specific Plan Area inside of the MSHCP, no mitigation is required for impacts to sensitive natural communities other than those defined in Section 6.1.2 (riparian/riverine and vernal pools) of the MSHCP, which are addressed in <b>MM-BIO-6</b> and <b>MM-BIO-12</b>.</p>	<p>Significant</p>
<p><b>Impact BIO-11b:</b> Development within the SPA and MSHCP would result in potential significant direct impact sensitive vegetation communities.</p>	<p><b>MM-BIO-6b</b></p> <p><b>MM-BIO-12: Jurisdictional Waters and Riparian/Riverine.</b></p> <p>Prior to ground disturbance or issuance of a grading permit on undeveloped land within the Northside Specific Plan, a Qualified Biologist shall assess the site to determine if there is potential for U.S. Army Corps of Engineers (ACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB) jurisdictional waters of the United States/state on the project site. If the project is in the <b>Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)</b>, the Qualified Biologist will also map any riparian/riverine resources that occur on the site and surrounding vicinity. If there is potential for these resources to occur, a formal delineation of these resources shall be conducted in accordance with each agency's requirements, guidance, and standards prior to issuance of a grading permit. If there are jurisdictional waters located on a project site, then the project grading plan shall identify and the applicant shall implement the following jurisdictional waters measures prior to the issuance of a grading permit.</p> <p>If avoidance of impacts to potentially jurisdictional areas is not practicable, then the project applicant shall obtain the applicable permits to impact these resources, such as a 404 permit from ACE, a Streambed Alteration Agreement from CDFW, and a 401 Water Quality Certification from the RWQCB as described in Northside Specific Plan Program Environmental Impact Report <b>CM-HYD-1</b>. Final mitigation requirements for the impact shall be established by these agencies, and a final wetlands/waters mitigation plan shall be prepared prior to issuance of a grading permit. However, at a minimum, the following requirements shall be met:</p> <ol style="list-style-type: none"> <li>1. All temporary impacts to jurisdictional waters will be restored on site. Restoration will include recontouring and erosion control with a native seed mix. Prior to seeding temporary ground disturbance areas, the Qualified Biologist will review the seeding palette to ensure that no seeding of invasive plant species, as identified in the most recent version of the California Invasive Plant Inventory for the region, will occur, and that the mix is appropriate for the area.</li> <li>2. Compensatory mitigation for permanent impacts to jurisdictional waters shall occur at no less than 1:1 ratio for the impacts to jurisdictional waters. A waters mitigation and monitoring plan shall be prepared that outlines the compensatory mitigation in coordination with the ACE, CDFW, and RWQCB. Mitigation shall include creation, enhancement, and/or restoration, and will be either completed on site or off site. The mitigation program shall be designed to replace the functions and values of the jurisdictional resources impacted, with requirements to achieve specific success criteria. The mitigation areas shall be designed to have similar vegetative characteristics (excluding exotic species) to those of the affected areas. If creation is provided, the site shall be designed to emulate the density and structure of the affected areas once the establishment areas have met the mitigation success criteria. As applicable, the qualified biologist shall determine the appropriate planting and seeding palettes.</li> </ol> <p>In addition to the requirements above for all future projects in the Specific Plan Area, projects within the MSHCP must prepare a determination of biologically equivalent or superior preservation, reviewed and approved by the City of Riverside or the County of Riverside, USFWS, and CDFW, to ensure replacement of any lost functions and values of riparian/riverine habitat as it related to covered species prior to the issuance of a grading permit; refer to MSHCP Section 6.1.2 for more information.</p> <p>Additionally, if a jurisdictional water of the United States/State is avoided by the project, the grading and construction plans shall identify that waters will be fenced off where humans can enter the site prior to the issuance of a grading or construction permit. If on-site avoidance occurs, it shall be verified prior to the issuance of a construction permit that non-native plant species listed on the most recent California Invasive Plant Council inventory (<a href="https://www.cal-ipc.org/plants/inventory/">https://www.cal-ipc.org/plants/inventory/</a>) with a rating of moderate or high shall not be included in landscaping.</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact BIO-12:</b> Construction-related impacts (i.e., generation of fugitive dust, changes in hydrology, release of chemical pollutants, etc.) would result in potential short-term or temporary significant indirect impacts to sensitive vegetation communities.</p>	<p><b>MM-BIO-2</b>  <b>MM-BIO-3</b>  <b>MM-BIO-11a</b>  <b>MM-BIO-11b</b>  <b>MM-BIO-12</b></p>	<p>Significant</p>
<p><b>Impact BIO-13:</b> Development-related activities (i.e., chemical releases, increased invasive plant species, trampling, soil compaction, etc.) would result in potential long-term indirect significant impacts to sensitive vegetation communities.</p>	<p><b>MM-BIO-4</b>  <b>MM-BIO-11a</b>  <b>MM-BIO-11b</b></p>	<p>Significant</p>
<p><b>Impact BIO-CUM-9:</b> In combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative impact to sensitive natural communities.</p>	<p><b>MM-BIO-3</b>  <b>MM-BIO-4</b>  <b>MM-BIO-6</b>  <b>MM-BIO-11a</b>  <b>MM-BIO-11b</b>  <b>MM-BIO-12</b></p>	<p>Significant</p>
<p><b>Impact BIO-14:</b> Although there are mapped resources within the SPA, there could be jurisdictional resources present outside of currently mapped resources and therefore there would be potential direct, significant impacts to state and federally regulated jurisdictional waters.</p>	<p><b>MM-BIO-12</b></p>	<p>Significant</p>
<p><b>Impact BIO-15:</b> Construction-related activities (i.e., generation of fugitive dust, changes in hydrology, release of chemical pollutants, etc.) would result in potential indirect significant impacts to jurisdictional waters.</p>	<p><b>MM-BIO-1a</b>  <b>MM-BIO-1b</b>  <b>MM-BIO-2</b>  <b>MM-BIO-12</b>  <b>MM-BIO-12</b></p>	<p>Significant</p>
<p><b>Impact BIO-16:</b> Development-related activities (i.e., increased invasive plant species, trampling, etc.) would result in potential long-term indirect significant impacts to jurisdictional waters.</p>	<p><b>MM-BIO-12</b></p>	<p>Significant</p>
<p><b>Impact BIO-CUM-10:</b> Implementation of the Specific Plan would result in potentially significant impacts to jurisdictional waters, which would result in cumulatively considerable impacts.</p>	<p><b>MM-BIO-1</b>  <b>MM-BIO-2</b>  <b>MM-BIO-3</b>  <b>MM-BIO-12</b></p>	<p>Significant</p>
<p><b>Impact BIO-CUM-11:</b> In combination with other projects that may occur within the cumulative study area, the</p>	<p><b>MM-BIO-1</b>  <b>MM-BIO-2</b>  <b>MM-BIO-3</b></p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p>Northside Specific Plan could result in a potentially significant cumulative impact to this area and to wildlife movement.</p> <p><b>Impact BIO-17:</b> If future development does not comply with MSHQP requirement of conducting habitat assessment for least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo, and conduct focused, protocol-level surveys the Northside Specific Plan could result in a significant impact.</p> <p><b>Impact BIO-18:</b> If the future development does not comply with MSHQP requirement of conducting 2 years of focused surveys for Delhi Sands flower-loving fly, the Northside Specific Plan could result in a significant impact.</p>	<p><b>MM-BIO-4</b>  <b>MM-BIO-12</b>  <b>MM-BIO-13</b>  <b>MM-BIO-1a</b>  <b>MM-BIO-1b</b>  <b>MM-BIO-4</b>  <b>MM-BIO-5</b>  <b>MM-BIO-6</b>  <b>MM-BIO-8</b>  <b>MM-BIO-10: Least Bell's Vireo, Southwestern Willow Flycatcher, and Western Yellow-Billed Cuckoo Habitat Assessment, Focused Surveys and Mitigation.</b></p> <p><b>Inside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).</b> Prior to ground disturbance or issuance of a grading permit on undeveloped sites inside the MSHCP within the Northside Specific Plan, a habitat assessment for suitable habitat for least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo shall be completed by a Qualified Biologist for the project site and a 500-foot buffer area. If a project site and surrounding 500-foot buffer are evaluated to have suitable habitat (nesting and/or foraging) for these riparian bird species, then protocol-level focused surveys are required prior to the issuance of a grading permit if the habitat will not be avoided. Surveys should be conducted according to accepted U.S. Fish and Wildlife Service (USFWS) protocols specific for each species (least Bell's vireo—USFWS 2001; southwestern willow flycatcher—USFWS 2000b; western yellow-billed cuckoo—USFWS 2015). If any of these riparian birds are confirmed present within 500 feet of the project site inside of the MSHCP, then the project grading plan shall list and the applicant shall implement the following measures to minimize or avoid impacts to least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.</p> <p>The project grading and construction activities shall avoid the breeding season for whichever riparian bird species is/are present on or within 500 feet of the project: April through July for least Bell's vireo, May through July for southwestern willow flycatcher, and June through August for western yellow-billed cuckoo, as feasible. If the breeding season cannot be avoided, then additional measures determined by a Qualified Biologist in consultation with the applicable jurisdiction shall be implemented to ensure that no indirect take occurs. Specifically, project equipment that results in noise levels above 60 decibels (dB) shall be fitted with sound dampeners or equivalent noise reduction measures shall be completed to reduce noise to below 60 dB at breeding habitat. On-site noise monitoring shall also be required to ensure that project-related activities do not result in average noise levels increasing above 60 dB at riparian bird breeding habitat during the breeding season. If any project activities exceed 60 dB, or the on-site monitor determines project activities are resulting in harassment, which could cause nest failure, the monitor would have the authority to halt activities until additional measures (such as a sound wall) can be implemented. Additionally, if any of these riparian birds are confirmed present on the project site, 90% of those portions of the site that provide for long-term conservation value for these species shall be avoided. If the 90% avoidance threshold cannot be met, the applicant must prepare a determination of biological equivalent or superior preservation (DBESP) document for these riparian birds that would include preservation, enhancement, re-establishment, and/or establishment of suitable riparian habitat at a 3:1 ratio. The DBESP shall include an analysis that demonstrates the lost functions and values of the impact will be replaced by the proposed measures. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, USFWS, and California Department of Fish and Wildlife as described in the Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future CEQA document approvals. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p> <p><b>MM-BIO-11</b>  <b>MM-BIO-12</b>  <b>MM-BIO-14a: Delhi Sands Flower-Loving Fly.</b></p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
	<p><b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</b> Delhi Sands flower-loving fly is not expected to occur outside of the MSHCP. There are no mapped Delhi Sands outside of the MSHCP in the City of Colton. Thus, no Delhi Sands flower-loving fly mitigation is required for future projects in the Northside Specific Plan outside of the MSHCP.</p> <p><b>MM-BIO-14b: Delhi Sands Flower-Loving Fly.</b>  <b>Inside of the MSHCP:</b> Prior to ground disturbance or issuance of a grading or construction permit on in areas containing open Delhi Sands (mapped per the MSHCP), 2 years of focused surveys for the Delhi Sands flower-loving fly shall be conducted by a Qualified Biologist. Surveys shall be conducted according to the accepted U.S. Fish and Wildlife Service (USFWS) protocol (2004); surveys shall be conducted two times per week from July 1 to September 20 for 2 consecutive years under suitable conditions. Areas that are 100% developed do not require focused surveys or further measures, but this assessment must be documented and provided to the applicable MSHCP Permittee (i.e., City of Riverside or County of Riverside). If Delhi Sands flower-loving fly are confirmed to be present on a project site, then the project grading plan shall identify, and the applicant shall implement the following Delhi Sands flower-loving fly measures prior to the issuance of a grading permit.</p> <p>Based on the Qualified Biologist surveys for Delhi Sands flower-loving fly, 90% of those portions of the site that provide for long-term conservation value for the species shall be avoided, and equivalency findings shall be made, if the 90% avoidance threshold cannot be met, then the applicant must prepare a determination of biological equivalent or superior preservation (DBESP) document for Delhi Sands flower-loving fly to be reviewed and approved by the City of Riverside or County of Riverside, and USFWS prior to the issuance of a grading permit or, as applicable, any future California Environmental Quality Act document approvals. The DBESP shall include an analysis that demonstrates the lost functions and values of the impact will be replaced by the proposed measures. More specifically, the applicant shall mitigate the loss of mapped Delhi Soils (or occupied habitat) at a minimum of 1:1 ratio through the purchase of credits from the Colton Dunes Conservation Bank or other Wildlife Agency-approved conservation bank. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p>	<p>Significant</p>
<p><b>Impact BIO-CUM-12:</b> Regarding compliance with the MSHCP, future development allowed under the Northside Specific Plan within the MSHCP would be potentially inconsistent with the MSHCP unless assurances are provided that future projects would implement measures consistent with the MSHCP, resulting in a potentially significant cumulative impact, since other development occurring within the cumulative study area could also result in a conflict with the adopted MSHCP.</p>	<p><b>MM-BIO-4</b>  <b>MM-BIO-10</b>  <b>MM-BIO-14a</b>  <b>MM-BIO-14b</b></p>	<p>Significant</p>
<p><b>Cultural Resources</b></p> <p><b>Impact CUL-1:</b> Changes in development allowed in Subareas 1 to 5, 7 to 12, and 16 would result in potentially significant impacts to historic resources.</p> <p><b>Impact CUL-CUM-1:</b> In combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative impact to historical resources.</p>	<p><b>MM-CUL-1: Identification and Protection of Historical Resources.</b> Prior to issuance of any demolition, grading, or building permit for projects within the Northside Specific Plan, the City Historic Preservation Officer or Qualified Designees of the applicable jurisdiction shall determine if a historic built environment resource (e.g., buildings, structures, and objects) over 45 years of age has potential to be affected by the proposed demolition activities. If a potential historic resource is identified, a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61) shall record and evaluate any properties over 45 years old that have not been previously evaluated, or require evaluation updates due to the passage of time or changes to baseline conditions. The qualified professional will: (1) review current California Historical Resources Information System (CHRIS) records search and Historic Resources Inventory (HRI) data to ensure that previously recorded resources are identified; (2) survey the project site for potential historical resources and document the resource(s) with notes and photographs; (3) record and evaluate any potential resources, including completion of adequate background and archival research on applicable properties, establishment of an appropriate historic context, application of state and local designation criteria, and preparation of the appropriate set of State of California Department of Parks and Recreation Series 523 Forms (DPR forms); and (4) conduct an assessment of potential impacts to any identified historical resources in consideration of project-related activities that may result in substantial adverse change to the significance of an historical resource. Based on this impacts assessment and consistent with the applicable City of Colton Municipal Code Chapter 15.40 Historic Preservation and City of Riverside Municipal Code Chapter 20, as applicable, the City shall commit to avoiding historical resources or ensuring that all project-related activities with the potential to impact historic resources are in conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (NPS 2017) to the extent feasible.</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact CUL-2:</b> The proposed designation of a Trujillo Adobe Heritage Village and the associated anticipated restoration of the Trujillo Adobe also has potential to result in a significant historic resource impact.</p>	<p><b>MM-CUL-2: Trujillo Adobe Historic Preservation.</b> Prior to issuance of any demolition, building or grading permit issuance related to the Trujillo Adobe or its immediate surroundings, the City of Colton shall ensure the applicant has retained the services of qualified historic preservation specialists to assist with additional analysis, documentation, project design review, and consultation with key local stakeholders in consideration of the proposed Trujillo Adobe restoration. The following steps shall be implemented prior to issuance of permits related to the Trujillo Adobe or adjacent properties:</p> <ul style="list-style-type: none"> <li>• <b>Establish a Required Study Boundary.</b> The Cities of Riverside and Colton shall establish a study boundary around the Trujillo Adobe that triggers consideration of the adobe in projects that fall within the established boundary. When establishing the boundary, it is important to consider potential indirect effects from vibration and visual intrusions to the resource's setting. Prior to implementation of any project within the established study boundary, the applicant shall retain a qualified historic preservation specialist to assess the potential for indirect impacts to the adobe as a result of adjacent construction activities, including the potential for groundborne vibration and visual intrusions.</li> <li>• <b>Updated Significance Evaluation.</b> The applicant shall retain a qualified architectural historian to prepare a detailed historical significance evaluation for the Trujillo Adobe in consideration of existing conditions as well as previously prepared resource documentation. The evaluation shall include a detailed historic context statement for the adobe that is developed through archival research. This evaluation should identify the specific features of the Trujillo Adobe that contribute to the resource's historical significance, including its setting, paths of circulation, materials, and related features and spaces. Likewise, the report shall identify features that do not contribute to the resource's historical significance or fall outside the Trujillo Adobe's period of significance (which must be clearly defined in the evaluation). The Trujillo Adobe shall be evaluated in consideration of City, County, California Register of Historical Resources, and National Register of Historic Places designation criteria and integrity requirements. Detailed photographs of the interior, exterior, and setting shall be included as part of the evaluation. If warranted, the report shall include recommendations for additional archival-level documentation prior to project implementation. The significance evaluation shall be subject to the approval of the City Historic Preservation Officer or Qualified Designees.</li> <li>• <b>Project Plan Development.</b> The applicant shall retain a qualified historic preservation architect/engineer (ideally with experience in adobe restoration) to assist in the development of the proposed restoration plans. These professionals may recommend preparation of additional studies in order to fully understand project-specific constraints. Development of the proposed project plans will consider the findings and recommendations of the updated significance evaluation with regard to retention of important character-defining features, historic materials, and historical connections; and will also consider feedback from local stakeholders with a vested interest in the Trujillo Adobe and its future. The project plan shall be subject to the approval of the City Historic Preservation Officer or Qualified Designees.</li> <li>• <b>Project Plan Review.</b> The applicant shall retain a qualified architectural historian to review the proposed design plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The architectural historian shall provide feedback in the form of a conformance review memorandum that provides an assessment of how the project meets the Standards, or likewise, does not meet the Standards. Based on this feedback, the applicant shall make adjustments (as warranted) to existing project plans in order to be in conformance with the Standards and avoid impacts to historical resources.</li> <li>• <b>Development of a Protection Plan.</b> Upon finalization of proposed project design plans, the applicant shall work with historic preservation professionals to develop a protection plan for the Trujillo Adobe and any associated historical resources. The plan should detail methods for protecting the adobe and its important historical features from inadvertent damage during construction-related activities, in consideration of adjacent construction and stabilization of the adobe building. Issues to consider include impacts resulting from vibration, dust and debris, and heavy machinery. The plan should also detail specific protection/safety measures for working in and around historic adobe structures. The protection plan shall be subject to the approval of the City Historic Preservation Officer or Qualified Designees.</li> </ul> <p><b>MM-CUL-3a: On-call Project Archaeologist.</b> Prior to the issuance of a grading permit for projects that would excavate previously undisturbed soils, the Property Owner/Developer shall provide a letter from a certified archaeologist and paleontologist stating that the Property Owner/Developer has retained these individuals as needed, and that the archaeologist shall be on call during all grading and other significant ground-disturbing activities in native sediments and a paleontologist shall be on call during excavations over 1,000 cubic yards within native sediments that have a high potential to yield significant fossils (see EIR Figure 3.6-2).</p> <p><b>MM-CUL-3b: Treatment and Disposition of Cultural Resources.</b> In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> <li>1. <b>Consulting Tribes Notified:</b> Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the City of Riverside Community &amp; Economic Development Department or applicable jurisdiction evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.</li> <li>2. <b>Temporary Curation and Storage:</b> During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with any tribal monitor providing oversight of the process.</li> </ol>	<p>Significant</p>
<p><b>Impact CUL-3:</b> if unanticipated archaeological discoveries are encountered, impacts to archaeological resources could be potentially significant.</p> <p><b>Impact CUL-CUM-2:</b> In combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative impact to archaeological resources.</p>	<p><b>MM-CUL-3a: On-call Project Archaeologist.</b> Prior to the issuance of a grading permit for projects that would excavate previously undisturbed soils, the Property Owner/Developer shall provide a letter from a certified archaeologist and paleontologist stating that the Property Owner/Developer has retained these individuals as needed, and that the archaeologist shall be on call during all grading and other significant ground-disturbing activities in native sediments and a paleontologist shall be on call during excavations over 1,000 cubic yards within native sediments that have a high potential to yield significant fossils (see EIR Figure 3.6-2).</p> <p><b>MM-CUL-3b: Treatment and Disposition of Cultural Resources.</b> In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> <li>1. <b>Consulting Tribes Notified:</b> Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the City of Riverside Community &amp; Economic Development Department or applicable jurisdiction evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.</li> <li>2. <b>Temporary Curation and Storage:</b> During the course of construction, all discovered resources shall be temporarily inventoried in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with any tribal monitor providing oversight of the process.</li> </ol>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact CUL-4:</b> Three historical archaeological resources (P-33-008650/CA-RIV-06166, P-33-004299/CA-RIV-04299, and P-33-008651/CA-RIV-06167), including one multicomponent resource, P-33-08752/CA-RIV-06237 (Riverside County), which is the same as resource P-36-09814/CA-SBR-09841 (San Bernardino County), has not been evaluated to determine if they are significant resources under CEQA and consequently, future project-related activities could result in significant impacts to these known archaeological resources.</p>	<p>3. <b>Treatment and Final Disposition:</b> The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains, as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community &amp; Economic Development Department or applicable jurisdiction with evidence of same:</p> <ul style="list-style-type: none"> <li>a. Accommodate the process for on-site reburial of the discovered items with any consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed.</li> <li>b. A curation agreement with an appropriate qualified repository within Riverside County or San Bernardino County, as applicable, that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.</li> <li>c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default.</li> <li>d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the applicable jurisdiction documenting monitoring activities conducted by the project archaeologist and any Native American Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property, describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the applicable jurisdiction, Eastern Information Center, and interested tribes.</li> </ul> <p><b>MM-CUL-3c: Cultural Sensitivity Training:</b> The Secretary of Interior Standards certified archaeologist and any Native American Tribal Monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.</p> <p><b>MM-CUL-4: Identification and Protection of Archaeological Resources.</b> Prior to issuance of any grading permit for project within the Northside Specific Plan, the applicable jurisdiction (City of Riverside, City of Colton, or County of Riverside) shall ensure that archaeological resources are identified and appropriately treated. This includes recordation and evaluation of any previously unevaluated archaeological resources. A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, shall record and evaluate archaeological resources that have not been previously evaluated, or require evaluation updates due to the passage of time or changes to site conditions; this mitigation measure also applies to any archaeological resource discovered as a result of project ground-disturbance activities. The qualified professional will: (1) review current CHRIS records search to ensure that previously recorded resources are identified; (2) survey the project site for potential archaeological resources and document the resource(s) with notes and photographs; (3) record and evaluate any potential archaeological resources and apply state and local designation criteria, and preparation of the appropriate set of State of California Department of Parks and Recreation Series 523 Forms (DPR forms); and (4) conduct an assessment of potential impacts to any identified archaeological resources in consideration of project-related activities that may result in substantial adverse change to the significance of an archaeological resource. Significance shall be assessed based on California Environmental Quality Act (CEQA) Section 15064.5 criteria. If a significant resource is identified, avoidance or minimization of the resource shall be completed consistent with the applicable CEQA Section 21083.2, City of Colton Municipal Code Chapter 15.40 Historic Preservation and City of Riverside Municipal Code Chapter 20, as feasible. If the discovery proves significant and avoidance is not possible, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted. Resources found not to be significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate DPR forms and inclusion of results in the survey and/or assessment report.</p>	<p>Significant</p>
<p><b>Geology and Soils</b></p> <p><b>Impact GEO-1:</b> Future development allowed under the Northside Specific Plan where Pleistocene-age geologic formations occur could result in a potentially significant paleontological resource impact.</p>	<p><b>MM-GEO-1:</b> Prior to issuance of a grading permit for projects within areas identified with a high paleontological sensitivity (older Quaternary alluvial deposits), a Qualified Paleontologist shall be retained per the Society of Vertebrate Paleontology guidelines (SVP 2010). The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the Society of Vertebrate Paleontology guidelines and shall outline requirements for pre-construction meeting attendance and worker environmental awareness training, where monitoring is required within the Northside Specific Plan area based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The Qualified Paleontologist shall attend the pre-construction meeting, and a paleontological monitor shall be</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact GEO-CUM-1:</b> Future development allowed under the Northside Specific Plan, in conjunction with future development within the cumulative study area could result in a potentially significant cumulative paleontological resource impact.</p>	<p>on site during rough grading and other ground-disturbing activities in previously undisturbed, fine-grained older Quaternary alluvial deposits. These deposits may be encountered at shallow depths below the surface. Within developed areas of Northside Specific Plan area, this depth is assumed to be at least 5 feet below the ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot-radius buffer. Once documentation and collection of the find is completed pursuant to the PRIMP and the Society of Vertebrate Paleontology guidelines, the monitor shall allow grading to recommence in the area of the find. Curation and storage of salvaged specimens in an approved repository institution shall be completed for all significant resources discovered and collected.</p>	
<p><b>Hazards and Hazardous Materials</b></p>		
<p><b>Impact HAZ-1:</b> The sites identified in Table 3.8-1 have open files with the DTSC and EPA, and future development at these sites has the potential to result in a significant upset or accident condition if not completed in compliance with regulations and with the proper oversight.</p>	<p><b>MM-HAZ-1:</b> Prior to the issuance of a grading or demolition permit for a site undergoing active remediation and environmental monitoring, the City with land use jurisdiction shall require written confirmation from the overseeing environmental agency to ensure the existing environmental contamination will not impact construction worker health and safety, future occupant health and safety, or future land use either on or nearby the site, or that a remediation plan has been developed and will be implemented in accordance with the overseeing environmental agency to ensure future activities will not exceed established regulatory thresholds for future land use either on or nearby the site.</p>	<p>Significant.</p>
<p><b>Impact HAZ-CUM-1:</b> In combination with other projects that may occur within the cumulative study area, the Northside Specific Plan could result in a potentially significant cumulative impact due to upset and accident conditions.</p>		
<p><b>Impact HAZ-2:</b> The sites identified in Table 3.8-2 have closed regulatory cleanup cases, but have remaining contamination that may have the potential to result in a significant upset or accident condition if future development is not completed in compliance with regulations and with the proper oversight.</p>	<p><b>MM-HAZ-2:</b> Prior to the issuance of a grading or demolition permit, sites with previously documented soil, soil vapor, and/or groundwater contamination cases that have been closed shall be reviewed by the City with land use jurisdiction to determine compliance with applicable regulatory standards for exposure limits based on the proposed land use (i.e., residential, commercial, industrial) as well as construction worker safety requirements. The applicant may be required to provide additional data (i.e., samples) and/or a health risk assessment to the City with land use jurisdiction to demonstrate such compliance prior to the issuance of a grading or demolition permit. If remaining contamination levels exceed the exposure limits for the proposed land use or worker safety, the City with land use jurisdiction shall consult the overseeing regulatory agency prior to the issuance of permits to determine an appropriate plan of action for remediation or work plan related to the potential hazards. Any remediation efforts shall ensure that potential hazardous materials are reduced to levels below the established regulatory thresholds, as needed.</p>	<p>Significant</p>
<p><b>Impact HAZ-CUM-2:</b> In combination with other projects that may occur within the cumulative study area, future development occurring within the SPA could result in a potentially significant cumulative impact due to development within one of these sites.</p>		
<p><b>Impact HAZ-3:</b> The potential for residual pesticides and metals on the Pellissier Ranch property may have the potential to result in a significant upset or accident condition if levels are above risk-based criteria.</p>	<p><b>MM-HAZ-3:</b> Prior to the issuance of a grading or construction permit, within the Pellissier Ranch area (Subarea 1 or 2), the City with land use jurisdiction shall require that surface soil impacts be assessed for future development to determine if residual pesticide contamination has impacted surface soils above applicable risk-based criteria. If levels are found to be above applicable risk-based criteria for future land development or construction worker safety, the City with land use jurisdiction will require additional remedial measures are taken to ensure the contaminated media does not impact human health of construction workers or future occupants, or the environment and future land use in accordance with regulations.</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Hydrology and Water Quality</b></p> <p><b>Impact HYD-1:</b> Adherence to MS4 permits and associated LID requirements would reduce significant impacts related to flooding in the Highgrove Overflow Channel to a degree, but cannot guarantee that all future project-level impacts of the Northside Specific Plan or combined project-level impacts would be below a level of significance and therefore would have a potentially significant impact.</p> <p><b>Impact HYD-CUM-1:</b> Adherence to requirements would reduce significant impacts related to flooding to a degree, but cannot guarantee that all future project-level impacts of the Northside Specific Plan or combined project-level impacts would be below a level of significance. Thus, cumulative impacts are considered potentially significant.</p>	<p><b>MM-HYD-1</b> Master Drainage Plan. In coordination with the Riverside County Flood Control and Water Conservation District (RCFC&amp;WCD), the City of Colton, and the County of Riverside, the City of Riverside shall develop a Master Drainage Plan – Northside Sub-Watershed to address drainage system improvement needs for future planned development within the Northside Specific Plan Area. The improvements shall be designed to ensure that the stormwater conveyance system will convey flows from a 100-year frequency flood events in a manner that ensures 100-year event flooding would not occur within structure development areas. This Master Drainage Plan shall identify when improvements would be needed and shall include information on the cost of the needed improvements, as well as a program to collect fees in order to implement the improvements at the time they are needed. Potential programs that may be utilized include a Community Facilities District, Capitol Improvement Project, or an update to the University Area Drainage Plan and associated addition of a Northside Sub-Watershed fee in accordance with the County Ordinance 460. This Master Drainage Plan shall include the following improvements (i.e., Highgrove Channel, Springbrook Wash, and University Wash) at a minimum, as well as address the need for the identified “proposed facilities” in the RCFC&amp;WCD CIP facility map that were generated based on the University Master Drainage Plan (Riverside County Flood Control District 1967).</p> <p><b>MM-HYD-1a: Highgrove Overflow Channel.</b> As the future developments within the Northside Specific Plan Subareas 2, 4, 5, 6, 7, 8, 9, and 16 take place within the Highgrove Channel 100-year Federal Emergency Management Agency (FEMA) flood plain overflow area, an improvement to the Highgrove Overflow Channel should be constructed consistent with the conceptual recommendations provided by Rick Engineering (2019, Program Environmental Impact Report Appendix F, Hydrology and Water Quality Letter Report), to convey overtopping flow from the existing Highgrove Channel and associated flooding during high intensity rainfall events. As indicated in the recommendation, providing a regional detention facility/basin within the AB Brown Sports Complex is desirable in addition to the improvement of the Highgrove Overflow Channel. The overflow channel should be designed to receive stormwater flows in Highgrove Channel in excess of approximately 1,000 cubic feet per second, and the regional detention facility/basin should be designed such that discharge into downstream Springbrook Wash is less than or equal to existing conditions (and/or its capacity, whichever is larger), to prevent downstream flooding impacts in developed areas. Design of the Highgrove Overflow Channel should be completed in coordination with the City of Colton, Riverside County Flood Control and Water Conservation District and Federal Emergency Management Agency (FEMA).</p> <p><b>MM-HYD-1b: Springbrook Wash Enhancement.</b> As the future developments within the Northside Specific Plan Subareas 2, 4, 5, 6, 7, 8, 9, and 16 take place, the existing Springbrook Wash drainage alignment/facility should be improved in the vicinity of the western boundary of the Former Riverside Golf Course, such that the improved Spring Wash will be aligned to flow within the open space in Subarea 8, farther away from the proposed Northside Specific Plan development, consistent with conceptual recommendations provided by Rick Engineering (2019, Program Environmental Impact Report Appendix F, Hydrology and Water Quality Letter Report). Design of the Springbrook Wash improvements should be completed in coordination with the City of Riverside, Riverside County Flood Control and Water Conservation District and FEMA prior to implementation of improvements to this area.</p> <p><b>MM-HYD-1c: University Wash Enhancement.</b> As the future development within the Northside Specific Plan Subarea 11, just east of Orange Street takes place, a preliminary hydraulic analysis should be completed consistent with recommendations by Rick Engineering (2019, Program Environmental Impact Report Appendix F, Hydrology and Water Quality Letter Report) along Springbrook Wash downstream from the confluence with University Wash in order to determine the flooding potential along this stretch of the creek prior to implementation of improvements to this area. Design of the Springbrook Wash improvements should be completed in coordination with the Riverside County Flood Control and Water Conservation District and Federal Emergency Management Agency prior to implementation of improvements to this area.</p>	<p>Significant</p>
<p><b>Impact HYD-2:</b> Adherence to MS4 permits and associated LID requirements would reduce significant impacts related to flooding in the Springbrook Wash to a degree, but cannot guarantee that all future project-level impacts of the Northside Specific Plan or combined project-level impacts would be below a level of significance and therefore would have a potentially significant impact.</p>	<p><b>MM-HYD-1</b></p> <p><b>MM-HYD-1a</b></p> <p><b>MM-HYD-1b</b></p> <p><b>MM-HYD-1c</b></p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact HYD-3:</b> Adherence to MS4 permits and associated LID requirements would reduce significant impacts related to flooding to other SPA drainages to a degree, but cannot guarantee that all future project-level impacts of the Northside Specific Plan or combined project-level impacts would be below a level of significance and therefore would have a potentially significant impact.</p> <p><b>Impact HYD-CUM-2:</b> Cumulative development within the watershed could potentially increase the amount of impervious surfaces that could cause or contribute to storm drain and creek bed capacity exceedance and/or require construction of new or expanded flood control infrastructure, resulting in a potentially significant cumulative impact.</p>	<p><b>MM-HYD-1</b>  <b>MM-HYD-1a</b>  <b>MM-HYD-1b</b>  <b>MM-HYD-1c</b></p>	<p>Significant</p>
<p><b>Impact HYD-4:</b> Adherence to applicable MS4 permits and associated LID requirements to control runoff (<b>CM-HYD-2a</b> and <b>CM-HYD-2b</b>), but cannot guarantee that all future project-level impacts of the Northside Specific Plan or combined project-level impacts would be below a level of significance and therefore impacts are considered potentially significant.</p>	<p><b>MM-HYD-1</b>  <b>MM-HYD-1a</b>  <b>MM-HYD-1b</b>  <b>MM-HYD-1c</b></p>	<p>Significant</p>
<p><b>Impact HYD-5:</b> Adherence to applicable MS4 permits and associated LID requirements to control runoff (<b>CM-HYD-2a</b> and <b>CM-HYD-2b</b>), but cannot guarantee that all impacts would be below a level of significance. Impeding and/or redirecting flood flows could increase the potential for flooding downstream of proposed structures within the SPA. Impacts are considered potentially significant.</p>	<p><b>MM-HYD-2: Levee Accreditation.</b> Prior to a Development Plan Approval within the Northside Specific Plan, within the Riverside Levee 2 flood protection area, and in coordination with Federal Emergency Management Agency (FEMA) approval of Physical Map Revisions or Letter of Map Revision of the Specific Plan Area, Riverside Levee 2 should be accredited by FEMA and shown to effectively protect the Northside Specific Plan Area against 100-year flooding hazards related to the Santa Ana River.</p> <p><b>FEMA Revisions.</b> A Federal Emergency Management Agency (FEMA) Physical Map Revision or a Letter of Map Revision of the Specific Plan Area should be completed, based on modeling by the Riverside County Flood Control and Water Conservation District, prior to Development Plan Approval of future projects located within the 100-year FEMA flood plain in the Northside Specific Plan Area. Hydrologic modelling in support of the revisions should include, but not be limited to, stormwater runoff within Highgrove Channel, the Highgrove Channel Overflow Channel, Springbrook Wash, and University Wash.</p> <p><b>MM-HYD-1d</b></p> <p><b>MM-HYD-3: Storm Drain Enhancement.</b> Consistent with the concept recommendations provided by Rick Engineering (2019, Program Environmental Impact Report Appendix F, Hydrology and Water Quality Letter Report), storm drains shall be installed in association with Northside Specific Plan development in areas currently lacking storm drains (see Figure 3.9-2, Drainage Conditions). Storm drain installation shall include, but not be limited to:</p> <ol style="list-style-type: none"> <li>1. Extending a backbone storm drain north along Main Street from Springbrook Wash;</li> </ol>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>2. Adding a storm drain system for the proposed light industrial and high-tech business park, within the City of Colton, to safely collect and convey runoff into Highgrove Channel;</p> <p>3. Adding a storm drain system in the proposed transitional business/multifamily residential and medium density residential along Center Street, to collect flows into the proposed Highgrove Overflow Channel (MM-HYD-1), and</p> <p>4. Providing flood control detention to pre-project stormwater runoff conditions for all proposed new developments in the Specific Plan Area, for all design storms required by the Riverside County Flood Control and Water Conservation District.</p> <p>Proposed drainage improvements shall be designed per the 1978 Riverside County Flood Control and Water Conservation District Hydrology Manual and in coordination with the Riverside County Flood Control and Water Conservation District.</p> <p><b>MM-HYD-4 Hydrology/Drainage Report.</b> Prior to the issuance of a building permit for future development within the Northside Specific Plan, a Hydrology/Drainage Report shall be prepared. The Hydrology/Drainage Report shall demonstrate that stormwater runoff flow volume or flow rate, associated with specific projects, would be less than or equal to existing conditions to prevent on- and off-site runoff and flooding. This may require an onsite flood control detention facility/basin at each of the specific projects as a mitigation measure (or regionally). The Hydrology/Drainage Report shall comply with the 1978 Riverside County Flood Control and Water Conservation District Hydrology Manual and the ordinance for storm drain planning and design calculations.</p> <p><b>MM-HYD-5 Flood Elevations.</b> Prior to a Development Plan Approval within the Northside Specific Plan, it shall be verified by the City Engineer that development is either (1) located outside the 100-year Federal Emergency Management Agency (FEMA) flood plain or (2) that the proposed development within the revised 100-year flood plain shall be constructed a minimum of 1 foot above anticipated flood elevations, as determined by FEMA.</p> <p><b>MM-HYD-5</b></p>	Significant
<p><b>Impact HYD-6:</b> proposed Specific Plan includes the build-out of industrial zones, which can use toxic chemicals and other materials that would be detrimental to the neighboring environment should flooding occur, therefore impacts are considered potentially significant.</p> <p><b>Impact HYD-CUM-3:</b> The Northside Specific Plan includes the build-out of industrial zones, which can use toxic chemicals and other materials that would be detrimental to the neighboring environment should flooding occur, resulting in a potentially significant cumulative impact.</p> <p><b>Land Use and Planning</b></p> <p><b>Impact LU-CUM-1:</b> The effectiveness in reducing construction and operational emissions cannot be accurately quantified and there would be a potential conflict with the South Coast Air Quality Management Plan. Therefore, the Northside Specific Plan would be inconsistent with the South Coast Air Quality Management Plan and would</p>	<p>See <b>MM-AQ-1</b> through <b>MM-AQ-7</b></p>	Significant

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p>result in a cumulatively significant impact.</p>		
<p><b>Noise</b></p>		
<p><b>Impact NOI-1:</b> Noise from construction activities comparable to those featured in Table 3.1.1-10 and related to implementation of the Northside Specific Plan would potentially be significant when they are sufficiently proximate to on-site and off-site receptors.</p> <p><b>Impact NOI-CUM-1:</b> Construction activities combined with foreseeable construction noise from nearby development could result in a cumulatively considerable substantial increase in ambient noise levels in a cumulative study area, resulting in a potentially significant cumulative impact.</p>	<p><b>MM-NOI-1: Construction Noise Abatement Measures.</b> The following practices would reduce any construction equipment noise level increases to the outdoor ambient sound environment at nearby noise-sensitive residential land uses.</p> <ul style="list-style-type: none"> <li>• Prior to approval of grading plans and/or issuance of building permits, a note shall be included on the plans requiring adherence to City of Riverside, City of Colton or County of Riverside allowable hours of construction. The responsible project supervisor shall ensure compliance with these standards on site, and the County or municipal entity having jurisdiction shall conduct site inspections to check for compliance at its discretion.</li> <li>• Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, air intakes, shrouds, etc. consistent with manufacturers' standards.</li> <li>• Construction contractors shall orient and locate all stationary construction equipment (generators, compressors, pumps, etc.) in a manner that maximizes the distance to a nearest noise-sensitive receptor, and/or directs the loudest side of noise emission away from said receptor.</li> <li>• As needed, such as when source-to-receptor distances have been maximized to the extent practical, on-site contractors shall install or field-erect temporary noise barriers to occlude direct paths of sound (and thus attenuate noise level) between noisy equipment and the nearest noise-sensitive receptors. Locating material or debris containers, tanks, trailers, or other solid path-occluding obstructions may also achieve comparable noise reducing effects.</li> <li>• Construction contractors shall locate equipment staging in areas that will create the greatest distance between on-site noise-producing equipment, vehicles, and processes and the nearest noise-sensitive receptors to the project site.</li> <li>• Construction contractors shall establish a communication channel (telephone and/or email) so that members of the public may report noise concerns. The contractors shall designate a representative (or team) to respond to such inquiries and investigate them in a timely manner. If complaints are determined to be valid and attributed to project construction activity, the representative shall inform the applicable jurisdiction and the construction contractor shall implement reasonable and feasible measures to address the complaint.</li> </ul>	<p>Significant.</p>
<p><b>Impact NOI-2:</b> On-site traffic noise impacts for the Northside Specific Plan are anticipated to be potentially significant and unavoidable.</p> <p><b>Impact NOI-CUM-2:</b> On-site traffic noise impacts for the Northside Specific Plan are anticipated to be potentially significant and unavoidable, while off-site (cumulative study area) traffic noise impacts would be potentially significant.</p>	<p>No mitigation proposed.</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact NOI-3:</b> If the proximity to sensitive receptors of a specific project developed as a result of Specific Plan required construction equipment comparable to those listed in Table 3.1.1-29 to be operated within the indicated distances, construction-related vibration impacts would be significant.</p> <p><b>Impact NOI-CUM-3:</b> Other cumulative projects in the vicinity of the Northside Specific Plan could result in a cumulatively considerable impact regarding ground-borne vibration and ground-borne noise during construction</p>	<p><b>MM-NOI-2 Construction Vibration Abatement Measures.</b> If heavy construction equipment similar to those listed in Table 3.1.1-29 are expected to be in usage on-site and within the indicated screening distances to avoid significant impact, the following shall be implemented:</p> <ul style="list-style-type: none"> <li>A pre-construction condition survey shall be prepared by a qualified independent structural engineer, documenting information that includes existing conditions of the construction site in the vicinity of the off-site vibration-sensitive receptor (e.g., residence or historic structure), and observable conditions of the receiving structure (e.g., façades).</li> <li>During construction, the contractor(s) shall install and maintain at least one continuously operational automated vibration monitor at the receptor(s) of concern. The monitor(s) must be capable of being programmed with at least one pre-determined vibratory velocity level, such as a peak vector sum or single-axis alert equivalent to the following: <ul style="list-style-type: none"> <li>For residential structures, 0.27 inches per second (in/sec) peak particle velocity (PPV) to warn of continuous vibration approaching the 0.3 ips PPV standard.</li> <li>For historic structures, 0.08 inches per second (in/sec) peak particle velocity (PPV) to warn of continuous vibration approaching the 0.12 ips PPV standard.</li> </ul> </li> </ul> <p>The monitoring system must produce real-time specific alerts (e.g., via text message and/or email to on-site personnel) when vibration velocities exceed the predetermined levels. In the event of an alert, feasible steps to reduce vibratory levels shall be undertaken, including but not limited to halting/staggering concurrent activities and using lower-vibratory techniques. In the event of an exceedance alert, work in the vicinity shall be suspended and the concerned building or structure visually inspected for potential damage. Results of the inspection must be logged. Work shall be resumed and re-monitored briefly after implementation of vibration-reducing means or methods. If said methods exhibit vibration velocity levels that are compliant with the standard and remain in usage or in place for the duration of the need construction activity, work may resume until its determined completion on-site. If initial vibration monitoring after installation of these methods demonstrates that threshold approach alerts continue to occur and suggest risk of exceeding the applicable standard, additional and/or better-performing measures shall be applied and then re-assessed with subsequent vibration monitoring that confirms compliance with the standard while such measures are in place and until the vibration-producing has ceased or is completed. A post-construction condition survey shall be prepared by a qualified independent structural engineer, documenting information that includes observable post-construction conditions of the concerned receiving structure(s).</p>	<p>Significant.</p>
<p><b>Transportation</b></p>		
<p><b>Impact TR-1A:</b> Impacts to Center Street / Stephens Avenue (AM; LOS F) under Existing Plus Project Conditions – Scenario 1.</p> <p><b>Impact TR-1B:</b> Impacts to Center Street / Stephens Avenue (AM; LOS F) under Existing Plus Project Conditions – Scenario 2.</p>	<p><b>MM-TR-1:</b> Center Street / Stephens Avenue</p> <p><i>Existing Plus Project Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Widen east leg of intersection to construct one left-turn lane and one shared through/ right-turn lane on the westbound approach.</li> <li>Widen west leg of intersection to construct one left-turn lane, one through lane, and one right-turn lane on the eastbound approach.</li> <li>Provide protected left-turn phasing on the eastbound and westbound approaches.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-2A:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps; Stephens Avenue (AM/PM; LOS F) under Existing Plus Project Conditions – Scenario 1.</p> <p><b>Impact TR-2B:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps; Stephens Avenue (AM/PM; LOS F) under Existing Plus Project Conditions – Scenario 2.</p>	<p><b>MM-TR-2:</b> W La Cadena Drive / I-215 SB Ramps / Stephens Avenue</p> <p><i>Existing Plus Project and Horizon Year 2040 Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Restripe south leg of intersection to provide one left-turn lane and one shared through/ right-turn lane on the northbound approach.</li> <li>Restripe north leg of intersection to provide one left-turn lane and one shared through/ right-turn lane on the southbound approach.</li> <li>Widen west leg of intersection to construct one shared left-turn/through lane and one right-turn lane on the eastbound approach.</li> <li>Provide protected left-turn phasing on the northbound and southbound approaches.</li> <li>Provide split phasing on the eastbound and westbound approaches.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-2C:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps; Stephens Avenue (AM/PM; LOS F) under Horizon Year 2040 Specific Plan</p>		

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p>Scenario 1 without the Orange Street Extension.</p> <p><b>Impact TR-2D:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps- Stephens Avenue (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension.</p> <p><b>Impact TR-2E:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps- Stephens Avenue (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions without the Orange Street Extension.</p> <p><b>Impact TR-2F:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps- Stephens Avenue (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>		
<p><b>Impact TR-3A:</b> Impacts to Center Street / Highgrove Place (AM/PM: LOS F) under Existing Plus Project Conditions – Scenario 1.</p> <p><b>Impact TR-3B:</b> Impacts to Center Street / Highgrove Place (AM/PM: LOS F) under Existing Plus Project Conditions – Scenario 2.</p> <p><b>Impact TR-3C:</b> Impacts to Center Street / Highgrove Place (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p> <p><b>Impact TR-3D:</b> Impacts to W. Center Street / Highgrove Place (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension</p> <p><b>Impact TR-3E:</b> Impacts to W. Center Street / Highgrove Place (AM: LOS E) under Horizon Year 2040 Specific Plan</p>	<p><b>MM-TR-3:</b> West Center Street / Highgrove Place</p> <p><i>Existing Plus Project Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Install a traffic signal at the intersection.</li> <li>• Provide permitted left-turn phasing on all four approaches.</li> <li>• Widen east leg of intersection to construct one left-turn lane and one shared through/ right-turn lane on the westbound approach (Does not apply to impacts under the Horizon Year 2040 scenarios</li> <li>• Widen west leg of intersection to construct one left-turn lane and one shared through/ right-turn lane on the eastbound approach. (Does not apply to impacts under the Horizon Year 2040 scenarios</li> </ul> <p><i>Horizon Year 2040 Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>• Install a traffic signal at the intersection.</li> <li>• Provide permitted left-turn phasing on all four approaches</li> </ul>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p>Scenario 2 conditions without the Orange Street Extension.</p> <p><b>Impact TR-3F:</b> Impacts to W. Center Street / Highgrove Place (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>		
<p><b>Impact TR-4A:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps: Interchange Drive (AM/PM: LOS F) under Existing Plus Project Conditions - Scenario 1.</p> <p><b>Impact TR-4B:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps: Interchange Drive (AM: LOS E; PM: LOS F) under Existing Plus Project Conditions - Scenario 2.</p>	<p><b>MM-TR-4:</b> W La Cadena Drive / I-215 SB Ramps / Interchange Drive</p> <p><i>Existing Plus Project and Horizon Year 2040 Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Install a traffic signal at the intersection.</li> <li>• Widen north leg of intersection to construct one left-turn lane, one shared left-turn/ through lane, and one right-turn lane on the southbound approach.</li> <li>• Widen westbound approach (Southbound I-215 Off-Ramp) to construct one shared left-turn/through lane and one shared through/right-turn lane.</li> <li>• Provide split phasing for all four intersection approaches.</li> <li>• Provide a right-turn overlap phase on the southbound approach.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-4C:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps: Interchange Drive (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p>		
<p><b>Impact TR-4D:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps: Interchange Drive (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension.</p>		
<p><b>Impact TR-4E:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps: Interchange Drive (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions without the Orange Street Extension.</p>		
<p><b>Impact TR-4F:</b> Impacts to W. La Cadena Drive / I-215 Southbound Ramps: Interchange Drive (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>		
<p><b>Impact TR-5A:</b> Impacts to E. La Cadena Drive / I-215 Northbound Ramps</p>	<p><b>MM-TR-5:</b> E La Cadena Drive / I-215 NB Ramps</p>	<p>Significant</p>

**Table S-3, Summary of Significant Effects and Mitigation Measures**

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact TR-5B:</b> Impacts to E. La Cadena Drive / I-215 Northbound Ramps (AM/PM: LOS F) under Existing Plus Project Conditions - Scenario 2.</p>	<p><b>Existing Plus Project and Horizon Year 2040 Scenarios</b> The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Install a traffic signal at the intersection.</li> <li>• Restripe northbound approach to provide one left-turn lane and one shared left-turn/through lane.</li> <li>• Restripe the Northbound I-215 On-Ramp to eliminate the existing southbound channelized right-turn movement and provide a second receiving lane for the recommended second northbound left-turn lane.</li> <li>• Provide split phasing on the northbound and southbound approaches.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-5C:</b> Impacts to E. La Cadena Drive / I-215 Northbound Ramps (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p>	<p><b>Existing Plus Project and Horizon Year 2040 Scenarios</b> The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Restripe northbound approach to provide one left-turn lane and one shared left-turn/through lane.</li> <li>• Restripe the Northbound I-215 On-Ramp to eliminate the existing southbound channelized right-turn movement and provide a second receiving lane for the recommended second northbound left-turn lane.</li> <li>• Provide split phasing on the northbound and southbound approaches.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-5D:</b> Impacts to E. La Cadena Drive / I-215 Northbound Ramps (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension.</p>	<p><b>Existing Plus Project and Horizon Year 2040 Scenarios</b> The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Restripe northbound approach to provide one left-turn lane and one shared left-turn/through lane.</li> <li>• Restripe the Northbound I-215 On-Ramp to eliminate the existing southbound channelized right-turn movement and provide a second receiving lane for the recommended second northbound left-turn lane.</li> <li>• Provide split phasing on the northbound and southbound approaches.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-5E:</b> Impacts to E. La Cadena Drive / I-215 Northbound Ramps (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions without the Orange Street Extension.</p>	<p><b>Existing Plus Project and Horizon Year 2040 Scenarios</b> The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Restripe northbound approach to provide one left-turn lane and one shared left-turn/through lane.</li> <li>• Restripe the Northbound I-215 On-Ramp to eliminate the existing southbound channelized right-turn movement and provide a second receiving lane for the recommended second northbound left-turn lane.</li> <li>• Provide split phasing on the northbound and southbound approaches.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-5F:</b> Impacts to E. La Cadena Drive / I-215 Northbound Ramps (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>	<p><b>Existing Plus Project and Horizon Year 2040 Scenarios</b> The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Restripe northbound approach to provide one left-turn lane and one shared left-turn/through lane.</li> <li>• Restripe the Northbound I-215 On-Ramp to eliminate the existing southbound channelized right-turn movement and provide a second receiving lane for the recommended second northbound left-turn lane.</li> <li>• Provide split phasing on the northbound and southbound approaches.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-6A:</b> Impacts to Columbia Avenue / E. La Cadena Drive (AM: LOS E; PM: LOS F) under Existing Plus Project Conditions - Scenario 1.</p>	<p><b>MM-TR-6:</b> Columbia Avenue / E. La Cadena Drive <b>Existing Plus Project Scenarios</b> The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Modify signal phasing to provide a right-turn overlap phase on the westbound approach.</li> </ul> <p>The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>• Modify signal phasing to provide a right-turn overlap phase on the westbound approach.</li> <li>• Restripe eastbound approach to convert the existing right-turn lane to a shared through/right-turn lane, which will provide three through lanes on the eastbound approach.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-6B:</b> Impacts to Columbia Avenue / E. La Cadena Drive (AM: LOS D; PM: LOS E) under Existing Plus Project Conditions - Scenario 2.</p>	<p><b>Existing Plus Project Scenarios</b> The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Modify signal phasing to provide a right-turn overlap phase on the westbound approach.</li> </ul> <p>The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>• Modify signal phasing to provide a right-turn overlap phase on the westbound approach.</li> <li>• Restripe eastbound approach to convert the existing right-turn lane to a shared through/right-turn lane, which will provide three through lanes on the eastbound approach.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-6C:</b> Impacts to Columbia Avenue / E. La Cadena Drive (AM/PM: LOS E) under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p>	<p><b>Existing Plus Project Scenarios</b> The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Modify signal phasing to provide a right-turn overlap phase on the westbound approach.</li> </ul> <p>The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>• Modify signal phasing to provide a right-turn overlap phase on the westbound approach.</li> <li>• Restripe eastbound approach to convert the existing right-turn lane to a shared through/right-turn lane, which will provide three through lanes on the eastbound approach.</li> </ul>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact TR-6D:</b> Impacts to Columbia Avenue / E. La Cadena Drive (AM/PM: LOS E) under Horizon Year 2040 Specific Plan Scenario 1, conditions with the Orange Street Extension.</p> <p><b>Impact TR-6F:</b> Impacts to Columbia Avenue / E. La Cadena Drive (AM/PM: LOS E) under Horizon Year 2040 Specific Plan Scenario 2, conditions with the Orange Street Extension.</p>	<p><b>MM-TR-7A:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Existing Plus Project Conditions - Scenario 1.</p> <p><b>Impact TR-7B:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Existing Plus Project Conditions - Scenario 2.</p> <p><b>Impact TR-7C:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1, without the Orange Street Extension.</p> <p><b>Impact TR-7D:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1, conditions with the Orange Street Extension.</p> <p><b>Impact TR-7E:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2, conditions without the Orange Street Extension.</p> <p><b>Impact TR-7F:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2, conditions with the Orange Street Extension.</p> <p><b>Impact TR-8A:</b> Impacts to Main Street / Garner Road (AM/PM: LOS F) under Existing Plus Project Conditions - Scenario 1.</p>	<p>Significant</p>
<p><b>Impact TR-7G:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Existing Plus Project Conditions - Scenario 1.</p> <p><b>Impact TR-7H:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Existing Plus Project Conditions - Scenario 2.</p> <p><b>Impact TR-7I:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1, without the Orange Street Extension.</p> <p><b>Impact TR-7J:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1, conditions with the Orange Street Extension.</p> <p><b>Impact TR-7K:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2, conditions without the Orange Street Extension.</p> <p><b>Impact TR-7L:</b> Impacts to Main Street / Placentia Lane-Center Street (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2, conditions with the Orange Street Extension.</p> <p><b>Impact TR-8B:</b> Impacts to Main Street / Garner Road (AM/PM: LOS F) under Existing Plus Project Conditions - Scenario 1.</p>	<p><b>MM-TR-7:</b> Main Street / Placentia Lane-Center Street</p> <p><i>Existing Plus Project Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Install a traffic signal at the intersection.</li> <li>• Provide protected left-turn phasing on the northbound and southbound approaches.</li> <li>• Provide permitted left-turn phasing on the eastbound and westbound approaches.</li> <li>• Provide a right-turn overlap phase on the westbound approach.</li> <li>• Widen east leg of intersection to construct one shared left-turn/through lane and one right-turn lane on the westbound approach.</li> </ul> <p><i>Horizon Year 2040 Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>• Install a traffic signal at the intersection.</li> <li>• Provide protected left-turn phasing on the northbound and southbound approaches.</li> <li>• Provide permitted left-turn phasing on the eastbound and westbound approaches.</li> <li>• Provide a right-turn overlap phase on the westbound approach.</li> </ul> <p><b>MM-TR-8:</b> Main Street / Garner Road</p> <p><i>Existing Plus Project and Horizon Year 2040 Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact TR-8B:</b> Impacts to Main Street / Garner Road (AM/PM: LOS F) under Existing Plus Project Conditions – Scenario 2.</p>	<ul style="list-style-type: none"> <li>• Install a traffic signal at the intersection.</li> <li>• Provide protected left-turn phasing on the northbound and southbound approaches.</li> <li>• Provide split phasing on the eastbound and westbound approaches.</li> </ul>	
<p><b>Impact TR-8C:</b> Impacts to Main Street / Garner Road (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p>		
<p><b>Impact TR-8D:</b> Impacts to Main Street / Garner Road (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension.</p>		
<p><b>Impact TR-8E:</b> Impacts to Main Street / Garner Road (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions without the Orange Street Extension.</p>		
<p><b>Impact TR-8F:</b> Impacts to Main Street / Garner Road (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>		
<p><b>Impact TR-9A:</b> Impacts to Main Street / Strong Street (PM: LOS E) under Existing Plus Project Conditions – Scenario 1.</p>	<p><b>MM-TR-9:</b> Main Street / Strong Street Existing Plus Project Scenarios</p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Restripe the eastbound approach to provide one left-turn lane and one shared through/ right-turn lane.</li> <li>• Restripe the westbound approach to provide one left-turn lane and one shared through/ right-turn lane.</li> </ul> <p>Note: The Roquet Ranch Specific Plan and The Exchange projects are both required to implement the recommended improvements described above at the intersection of Main Street / Strong Street. Therefore, project responsibility would be shared between the Northside Specific Plan and these two projects.</p>	Significant
<p><b>Impact TR-9B:</b> Impacts to Main Street / Strong Street (PM: LOS E) under Existing Plus Project Conditions – Scenario 2.</p>		
<p><b>Impact TR-10A:</b> Impacts to Main Street / Oakley Avenue / SR-60 WB On-Ramp (AM/PM: LOS D) under Existing Plus Project Conditions – Scenario 1.</p>	<p><b>MM-TR-10:</b> Main Street / Oakley Avenue / SR60 WB On Ramp Existing Plus Project and Horizon Year 2040 Scenarios</p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>• Restripe westbound approach to provide one shared left-turn/through/right-turn lane and one right-turn lane.</li> </ul>	Significant
<p><b>Impact TR-10C:</b> Impacts to Main Street / Oakley Avenue / SR-60 WB On-Ramp (AM: LOS E) under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p>		

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact TR-10D:</b> Impacts to Main Street / Oakley Avenue / SR-60 WB On-Ramp (AM: LOS E) under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension.</p> <p><b>Impact TR-10F:</b> Impacts to Main Street / Oakley Avenue / SR-60 WB On-Ramp (AM: LOS E) under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>	<p><b>MM-TR-11:</b> Orange Street / Center Street</p> <p>Existing Plus Project Scenarios</p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Widen east leg of intersection to construct one left-turn lane and one shared through/right-turn lane on the westbound approach, and construct two eastbound receiving lanes.</li> <li>Widen and restripe west leg of intersection to provide one shared left-turn/through lane and one shared through/right-turn lane on the eastbound approach.</li> </ul> <p>Horizon Year 2040</p> <p>The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>Restripe westbound approach to provide one left-turn lane, one through lane and one right-turn lane.</li> </ul>	<p>Significant</p>
<p><b>Impact TR-11A:</b> Impacts to Orange Street / Center Street (PM: LOS C under Existing Plus Project Conditions - Scenario 1.</p> <p><b>Impact TR-11F:</b> Impacts to Orange Street / Center Street (PM: LOS C) under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p> <p><b>Impact TR-12A:</b> Impacts to S. Riverside Avenue / Pellissier Road (PM: LOS F) under Existing Plus Project Conditions - Scenario 1.</p> <p><b>Impact TR-12B:</b> Impacts to S. Riverside Avenue / Pellissier Road (AM/PM: LOS F) under Existing Plus Project Conditions - Scenario 1.</p> <p><b>Impact TR-12C:</b> Impacts to S. Riverside Avenue / Pellissier Road (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p> <p><b>Impact TR-12D:</b> Impacts to S. Riverside Avenue / Pellissier Road (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension.</p> <p><b>Impact TR-12E:</b> Impacts to S. Riverside Avenue / Pellissier Road (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions without the Orange Street Extension.</p>	<p><b>MM-TR-12:</b> South Riverside Avenue / Future Pellissier Road</p> <p>Existing Plus Project and Horizon Year 2040 Scenarios</p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Construct one left-turn lane and one right-turn lane on the westbound approach.</li> <li>Provide protected left-turn phasing on the southbound approach.</li> </ul> <p>Note: It is recommended that the City enter into a Memorandum of Understanding (MOU) with the City of Colton to allow for the transfer of fair share fees and promote completion of the identified improvements at the South Riverside Avenue / Pellissier Road intersection.</p>	<p>Significant</p>

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><b>Impact TR-12F:</b> Impacts to S. Riverside Avenue / Pellissier Road (AM/PM: LOS F) under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>	<p><b>MM-TR-15:</b> Adopt a Traffic Mitigation Fee Program. Within 12 months of the Northside Specific Plan approval, the City shall fund and subsequently adopt a fee mitigation program based on the Nexus Study (EIR Appendix H; Rick Engineering 2020), as follows:                      a. The mitigation program shall be based on the costs identified in the nexus study for the traffic improvements <b>MM-TR-1</b> to <b>MM-TR-14</b> as well as <b>PDF-TR-1</b> to <b>PDF-TR-12</b>. The mitigation program shall identify how the funds will be collected on a per project basis (e.g., by trip generated, unit, etc.). Costs shall include program administration, project administration and management, design and engineering, regulatory compliance, and construction. As indicated <b>MM-TR-1</b> to <b>MM-TR-14</b>, the mitigation program shall require the completion of improvements by the year 2030 for all impacts occurring under the Existing Plus Project scenario, and the completion of the improvements by the year 2040 for all impacts occurring under the Horizon Year conditions consistent with the Nexus Study. In addition, <b>PDF-TR-1</b> to <b>PDF-TR-8</b> shall be required to be implemented prior to the end of Year 2030 and <b>PDF-TR-9</b> to <b>PDF-TR-12</b> shall be required to be implemented prior to the end of Year 2040 consistent with the Nexus Study.                      b. Once the Northside Specific Plan traffic mitigation program is established, each project shall contribute its fair share of the traffic improvements as identified in the program prior to Certificate of Occupancy Permit.                      c. The City shall deposit the funds in a specific account dedicated for the use of completing the improvements identified in the Northside Specific Plan traffic mitigation program. The funds shall be used exclusively for the purpose of implementing mitigation for the impacts associated with buildout of the Specific Plan; however, upon completion of a citywide nexus study, this program could include additional improvements related to multi-modal facilities as well.                      d. The City shall complete an annual public report on the Northside Specific Plan traffic mitigation program within 180 days of the completion of the fiscal year pursuant to the Mitigation Fee Act (California Government Code Section 66000 et seq.). Considering the Nexus Study estimates improvement costs based on the Year 2020 (i.e., 2020 dollars), an evaluation of improvement costs (see part "a" above) shall be completed by a qualified Traffic Engineer in this annual assessment and approved by the applicable jurisdiction's Traffic Engineer to determine if changes in fees are necessary to ensure adequate funds are collected to complete the identified improvements within the identified timeframes.</p> <p><b>MM-TR-16:</b> Traffic Mitigation Agreement. Within 12 months of adoption of the Traffic Mitigation Fee Program, the City shall enter into a Traffic Mitigation Agreement with Caltrans, the City of Colton, and the County of Riverside, as needed and as feasible, for implementation of the necessary improvements identified above. Payment of fair-share fees shall be determined based on the increase in freeway traffic directly attributable buildout of the Northside Specific Plan.</p>	<p>Significant</p>
<p><b>Impact TR-13B:</b> Impacts to Columbia Avenue, from Primer Street to E. La Cadena Drive under Existing Plus Project Conditions - Scenario 1.</p> <p><b>Impact TR-13C:</b> Impacts to Columbia Avenue, from Primer Street to E. La Cadena Drive under Existing Plus Project Conditions - Scenario 1.</p> <p><b>Impact TR-13D:</b> Impacts to Columbia Avenue, from Primer Street to E. La Cadena Drive under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p> <p><b>Impact TR-13E:</b> Impacts to Columbia Avenue, from Primer Street to E. La Cadena Drive under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension.</p> <p><b>Impact TR-13F:</b> Impacts to Columbia Avenue, from Primer Street to E. La Cadena Drive under Horizon Year 2040 Specific Plan Scenario 2 conditions without the Orange Street Extension.</p> <p><b>Impact TR-13G:</b> Impacts to Columbia Avenue, from Primer Street to E. La Cadena Drive under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>	<p><b>MM-TR-13:</b> Impacts to Main Street / Spruce Street / Horizon Year 2040 Scenarios                      The following improvements are recommended to be implemented by the end of Year 2040:                      • Transition the existing shared through/right-turn lane to a dedicated right-turn lane. The other Specific Plan scenarios assume a single shared through/right-turn lane per proposed road diet on Main Street.</p>	<p>Significant</p>
<p><b>Impact TR-14D:</b> Impacts to Main Street / Spruce Street (PM: LOS C) under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p>	<p><b>MM-TR-14D:</b> Impacts to Main Street / Spruce Street / Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p>	<p>Significant</p>

**Table S-3, Summary of Significant Effects and Mitigation Measures**

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p>Scenario 1 conditions with the Orange Street Extension.</p> <p><b>Impact TR-14F:</b> Impacts to Main Street / Spruce Street (PM: LOS C) under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>		
<p><b>Impact TR-15C:</b> Impacts to Orange Street / Columbia Avenue (AM: LOS C) under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension without the Orange Street Extension.</p> <p><b>Impact TR-15D:</b> Impacts to Orange Street / Columbia Avenue (AM/PM: LOS C) under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension.</p>	<p><b>MM-TR-14:</b> Orange Street / Columbia Avenue</p> <p>Horizon Year 2040 Scenarios</p> <p>The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>• Restripe the north leg of intersection to provide one left-turn lane and one shared through/right-turn lane on the southbound approach.</li> <li>• Restripe the south leg of intersection to provide one left-turn lane and one shared through/right-turn lane on the northbound approach.</li> <li>• Widen westbound approach to construct a dedicated right-turn lane (Scenario One With Orange Street Extension Only Impact TR-15D).</li> </ul>	Significant
<p><b>Impact TR-16C:</b> Impacts to Columbia Avenue, from Orange Street to Primer Street under Horizon Year 2040 Specific Plan Scenario 1 without the Orange Street Extension.</p>	<p><b>MM-TR-15</b></p> <p><b>MM-TR-16</b></p>	Significant
<p><b>Impact TR-16D:</b> Impacts to Columbia Avenue, from Orange Street to Primer Street under Horizon Year 2040 Specific Plan Scenario 1 conditions with the Orange Street Extension.</p>		
<p><b>Impact TR-16E:</b> Impacts to Columbia Avenue, from Orange Street to Primer Street under Horizon Year 2040 Specific Plan Scenario 2 conditions without the Orange Street Extension.</p>		
<p><b>Impact TR-16F:</b> Impacts to Columbia Avenue, from Orange Street to Primer Street under Horizon Year 2040 Specific Plan Scenario 2 conditions with the Orange Street Extension.</p>		
<p><b>Impact TR-17E:</b> Impacts to Pellissier Road, from S. Riverside Avenue to Roquet Ranch under Horizon Year 2040 Specific Plan Scenario 2 conditions without the Orange Street Extension.</p>	<p><b>MM-TR-15</b></p> <p><b>MM-TR-16</b></p>	Significant

Table S-3, Summary of Significant Effects and Mitigation Measures

Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p><i>Tribal Cultural Resources</i></p> <p><b>Impact TCR-1:</b> Impacts to unknown subsurface TCRs to be impacted by future development allowed under the Northside Specific Plan.</p>	<p><b>MM-TCR-1</b></p> <p><b>Inadvertent Discovery of Tribal Cultural Resources.</b> While no tribal cultural resources (TCRs) have been identified that may be affected by the proposed Northside Specific Plan Area, if the City determines that the potential resource is a TCR (as defined by PRC, Section 21074), adherence to <b>MM-CUL-3b</b>, which identifies the treatment and disposition for the inadvertent discovery of Native American cultural resources, would be applicable for the handling of the inadvertent discovery of TCRs. <b>MM-CUL-3b</b> would require notifying tribes, in the case of TCRs, consulting under Assembly Bill 52 and Senate Bill 18 within 24 hours of discovery (<b>MM-CUL-3b1</b>); temporary curation and storage of discovered resources (<b>MM-CUL-3b2</b>); and protocol for the treatment and final disposition of the cultural resources (<b>MM-CUL-3b3</b>). If the potential resource is archaeological in nature, appropriate management requirements shall be implemented as outlined in mitigation measures <b>MM-CUL-3a</b> through <b>MM-CUL-3c</b> require that all construction work is immediately stopped until a qualified archaeologist can evaluate the significance of the find, and evaluate potentially significant impacts to archaeological resources and <b>MM-CUL-4</b> requires proper evaluation of the resource and implementation of avoidance or impact reduction. Implementation of proposed recommendations will be made based on the determination of the City that the approach is reasonable and feasible. All activities would be conducted in accordance with regulatory requirements.</p>	<p>Significant</p>

## Chapter 1 - Introduction

There are no changes to this chapter of the Draft Program EIR.

## Chapter 2 – Project Description

Table 2-1, Existing General Plan Land Uses Within the SPA, (Draft EIR page 2-2) was updated to reflect the change in acreage to the existing land uses within the SPA, as follows:

**Table 2-1. Existing General Plan Land Uses within the SPA<sup>1</sup>**

Land Use	Approx. Acres
<b>City of Riverside</b>	
Medium Density Residential	525.7

Figure 2-6, Proposed Specific Plan Land Uses, was updated to reflect (1) the removal of the Market Street Gateway District of the Downtown Specific Plan area and the immediately adjacent residential neighborhood from the southerly boundary of the Northside Specific Plan, and (2) addition of the Mobile Home Park Overlay. Due to the number of graphics and references in the EIR, technical reports, and associated figures and tables, they have not been removed using strikethrough text within this Final EIR Errata. Rather, the statement provided within this Final EIR has the effect of removing a District of the Downtown Specific Plan area and a residential neighborhood, not part of a Specific Plan, from the Northside Specific Plan; therefore, this Final EIR does not apply to the Downtown Specific Plan area.

Text edits have been made to the description of the Medium Density Residential Land Use Designation discussion in Section 2.4.1 of the Final EIR, as follows.

### **Medium Density Residential (MDR)**

The Medium Density Residential (MDR) designation would encompass approximately 589 acres of noncontiguous area within the SPA, within Subareas 7 and 12. The current land use designations include MDR, Business/Office Park (B/OP), Downtown Specific Plan (DSP), Semi-Rural Residential (SRR), Commercial (C) and Office (O). The MDR designation would yield a total of 4,521 dwelling units. Text edits have been made to the description of the High Density Residential Land Use Designation discussion in Section 2.4.1 of the Final EIR, as follows

### **High Density Residential (HDR)**

The High Density Residential (HDR) designation provides for the development of row houses, condominiums and apartments. Senior housing and multifamily clusters are also allowable. The designation allows 29 to 45 dwelling units per acre in the City of Riverside, and 29 to 36 dwelling units per acre in the City of Colton.

The HDR designation encompasses approximately 82 acres of the SPA, with 51 acres located within the City of Riverside in Subareas 3, 6, and 5; and 31 acres within the City of Colton in a portion of Subarea 1. The current land use designations for the proposed HDR designation is B/OP and C) within the City of

Riverside, and Light Industrial (M-1) within the City of Colton. Within the City of Riverside, the HDR land use would yield a total of 1,111 to 1,723 dwelling units. Within the City of Colton, the HDR land use would yield a total 900 to 1,120 dwelling units.

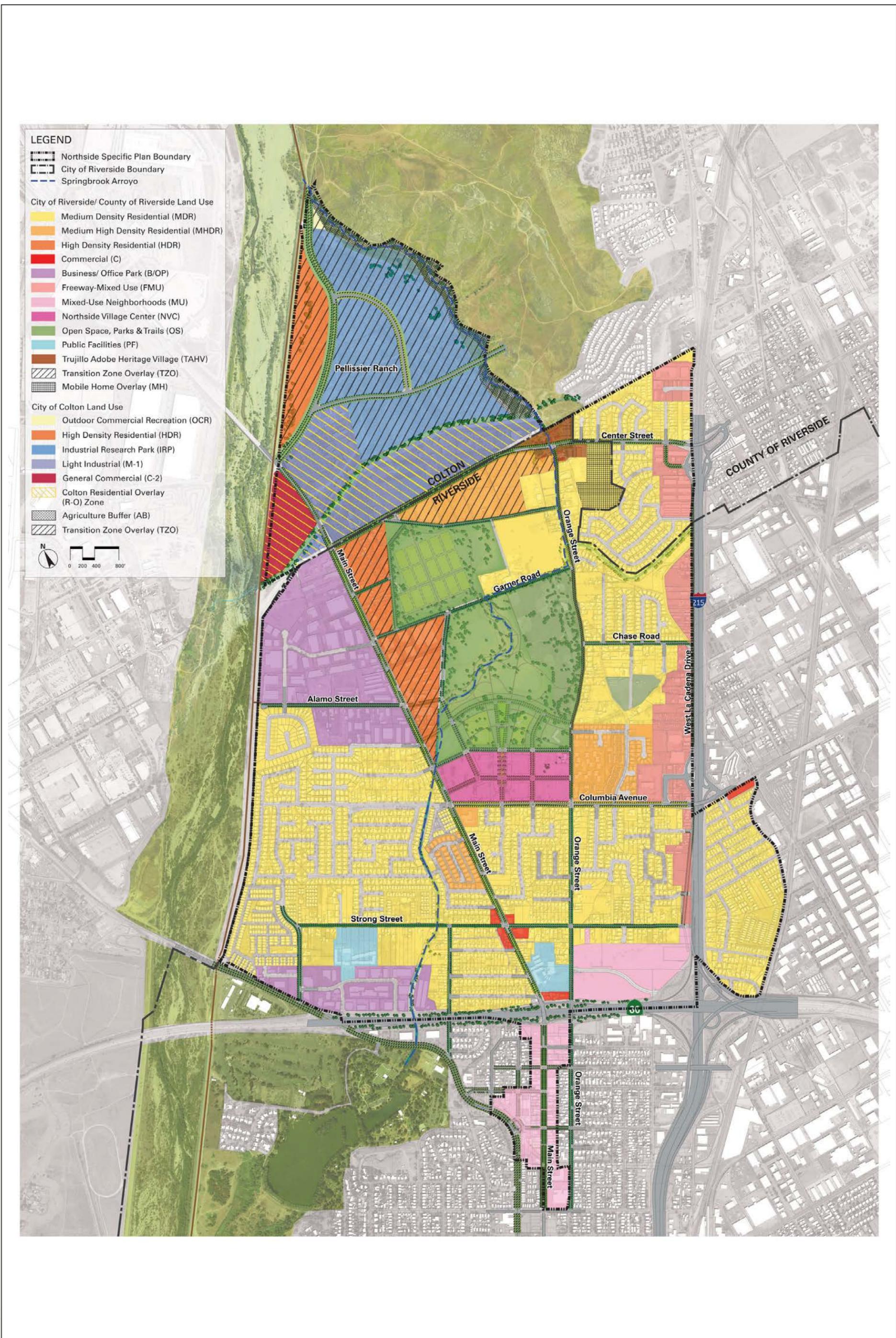
The HDR designation directly east of Main Street (Subareas 3, 5, 6) within the City and HDR designation in the northern portion of the SPA (Subarea 1) within the City of Colton would be subject to the TZO (see black hashed lines on Figure 2-6, Proposed Specific Plan Land Uses). The TZO would allow existing B/OP and Commercial uses (City of Riverside) and light industrial uses (City of Colton) to continue, and transition to residential uses over time, as market conditions evolve. Under the TZO, this area would yield a maximum of 4.2 million square feet of business/office park uses and 54,500 square feet of commercial uses, assuming the entire subarea is developed consistent with existing land uses. For the HDR designation subject to the TZO, an increase in residential density of up to 60 dwelling units per acre could be permitted within the City of Riverside, through a development agreement and payment of park impact fees or enhancement of Northside park facilities. This additional density could allow for up to 3,060 dwelling units in the HDR subareas in the City .

A text edit has been made to the acreage of Business/Office Park description in Section 2.4.1 of the Final EIR. The acreage was changed from 138 to 136 acres.

Revisions to the description of the Transition Overlay Zone description in Section 2.4.1 of the Final EIR, as follows.

#### **Transition Overlay Zone (TZO)**

In addition to the “base” land use categories above, a Transition Zone Overlay (TZO) covers key areas in Subareas 1, 3, 4, 5 and 6 (Figure 2-6, Proposed Specific Plan Land Uses). It overlays approximately 258 acres in the Specific Plan area, with 82 acres in the City of Riverside and 186 acres in the City of Colton. As previously mentioned, the TZO authorizes existing land uses to transition to new uses as established by the Specific Plan’s base zoning designations. In the City of Riverside, the TZO authorizes existing and entitled land uses to continue and expand, until which time the real estate market allows the properties to transition to their base zone, which is multi-family residential. In the City of Colton, the TZO authorizes the existing and entitled uses to continue and expand, until which time the real estate market allows the properties to transition to their base zone, which is either High Density Residential or Industrial Research Park. Such existing and entitled uses are authorized to continue as legally conforming uses, without being required to obtain additional discretionary approvals, and to expand until such time the use is replaced by a base-zoning use . The land use designation allows existing B/OP uses within the City of Riverside, and M-1 uses within the City of Colton, to continue, and to transition to HDR and IRP



SOURCE: Rick Engineering 2020

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

The TZO allows for a total of approximately 4.2 million square feet of Light Industrial uses (within up to 50,000 sf buildings) in the City of Colton, and approximately 54,500 square feet of Commercial uses within the City of Riverside.

A description of the Mobile Home Overlay zone was added to Section 4.2.1 of the Final EIR, as follows.

#### **Mobile Home Overlay (HMO)**

The area designated as MHO consist of approximately 13 acres in the City of Riverside, south of Center Street and east of Orange Street. This area is intended to allow for mobile home developments within the designated MHO area.

A textual edit has been made to the Light Industrial designation abbreviation in Section 4.2.1 of the Final EIR, which was revised "LI" to "M-1".

A description of the Industrial Research Park land use designation was added to Section 4.2.1 of the Final EIR, as follows.

#### ***Industrial Research Park***

The Industrial Research Park uses can include many of the same uses included in the Light Industrial designation, including fabrication, manufacturing, assembly, warehouse uses, and supporting commercial and office uses. Industrial Research Park uses also can include research and development facilities, laboratories, and similar uses found in research parks across the country. A key objective of the Industrial Research Park is to encourage innovation and a full range of corporate enterprise. These uses are compatible with those in nearby commercial and residential districts, and do not produce substantial environmental nuisances such as noise, odor, dust, smoke, or glare. Future developments should be attractive, reflect high-quality development standards, provide adequate buffering from less intensive land uses, and provide access to major transportation routes.

The Industrial Research Park is located in the City of Colton known as Pellissier Ranch. The Industrial Research Park designation also includes the Transition Zone Overlay.

A description of the Agricultural Buffer land use designation was added to Section 4.2.1 of the Final EIR, as follows.

#### ***Agriculture Buffer***

The Agriculture Buffer zone is located within the City of Colton, along the eastern edges of Pellissier Ranch. The total acreage of this area is approximately 41 acres and serves as a buffer between the Industrial Research Park area within Pellissier Ranch from areas east, outside of the Specific Plan area.

Table 2-3, Northside Specific Plan Allowed Land Use, (Draft EIR page 2-9) was updated to reflect the change in maximum density from 45 du/ac to 36 du/acre that was requested by the City of Colton. This change results in the reduction of the maximum dwelling units within Subarea 1 High Density Residential from 1,400 to 1,120 units and in an overall reduction in the total maximum dwelling units in the Northside Specific Plan from 13,112 to 12,832

units. In addition, the Market Street Gateway District of the Downtown Specific Plan area and the immediately adjacent residential neighborhood were removed from the southerly boundary of the Northside Specific Plan, which resulted in changes in Subareas 12 and 15. Due to the number of references in the EIR, technical reports, and associated figures and tables, they have not been removed using strikeout text within this Final EIR Errata. Rather, the statement provided within this Final EIR has the effect of reducing the High Density Residential in Subarea 1 to a maximum of 1,120 units; therefore, this Final EIR may not be used to authorize more than 1,120 residential units within Subarea 1. The row excerpts of this is as follows:

**Table 2-3. Northside Specific Plan Allowed Land Use**

Subarea	Land Use	Jurisdiction	Acreage	Min. DUs*	Max. DUs*	Square-foot*	Overlay
1	Industrial Research Park	C	152	-	-	2,500,000	4.0M LI (TZO)
	High Density Residential	C	31	900	1,120	-	
	Outdoor Commercial Recreation	C	3	6	6	-	
12	Medium Density Residential**	RC	63	315	315	N/A	-
	Medium Density Residential**	R	526	4,206	4,206	N/A	-
15	Business Office Park	R	136	-	-	9,000,000	
	Public Facilities/Institutional	R	11	-	-	479,200	
				10,930	12,510	16,559,700	

**Notes:**

\*A majority of the Intensity calculations were based on approximate developability factor of 75%.

\*\*Maximum du/acre or FAR/acre was used

R= City of Riverside; C= City of Colton; RC= County of Riverside

C= Commercial; B/OP= Business Office Park; LI= Light Industrial; PF/I= Public Facilities/Institutional

This does not include roadway areas, so the land use total acreage does not represent the total acreage within the Northside Specific Plan.

Throughout Section 2.4.2 of the Final EIR, the term “plant buffers” has been revised to read as “landscaped parkway.”

Section 2.4.2, Circulation, Mobility and Trails, (Draft EIR page 2-20) has been updated as follows to clarify the intended project timing of improvements:

***Orange Street***

The length of Orange Street has one roadway configuration. Orange Street (between SR-60 and Center Street) has approximately 67 feet of ROW. The street will be configured with two 11 foot travel lanes, 10-foot two-way bicycle track, 8 feet of parallel parking, two 6-foot plant buffers, one 7-foot sidewalk and one 5-foot sidewalk. The east side of Orange Street will include a travel lane, parallel parking, and sidewalk. The west side of Orange Street will include a travel lane, plant buffer, the two-way bicycle cycle track, and sidewalk. The configuration of Orange Street is designed to create a trail system leading between the Trujillo Adobe Heritage Park and Northside Village Center. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor

is built to accommodate the traffic. As such, two scenarios are considered; one with Orange Street connected north to the City of Colton (and future Roquet Ranch Specific Plan) and one with Orange Street terminating at the TAHV.

Table 2-6, Compliance Measures, was updated. These updates included:

- Aesthetic Compliance Measures (CMs) were clarified.
- Minor text edits to fix typos and grammatical errors were made to the air quality CMs. Additionally, CM-AQ-5 through CM-AQ-7 were added as air quality compliance measures.
- Minor text edits were made to clarify the water quality compliance measures to fix typos and to change CM-HYD-2a's timing from "prior to the issuance of a construction permit" to "prior to approval of development entitlements".
- Noise-related compliance measure text edits were made for clarification. The timing of Noise related compliance measures were edited from "prior to the issuance of any building permit or site entitlements" to "prior to approval of development entitlements". Additional clarifications of which jurisdiction the compliance measure would apply to were added."
- Updates to service compliance measures were completed to reflect the January 2020 adoption of the City of Colton Ordinance 02-20.
- The wildfire CMs were corrected.

The edits to Table 2-6 are as follows:

Table 2-6. Compliance Measures

Jurisdiction	City of Colton	County of Riverside
<b>Aesthetics</b>		
<p><b>CM-AES-1:</b> Future development shall comply with the Section 19.556.020 of the City of Riverside’s Municipal Code that contains the City’s lighting design and development standards including regulations surrounding the use of directed, oriented, and shielded lighting to prevent light from shining onto adjacent properties, onto public rights-of-way and into driveway areas. Future development within the jurisdiction of City of Colton or County of Riverside shall comply with the appropriate requirements related to lighting.</p> <p><b>CM-AES-2:</b> Future development within the City of Riverside would be required to comply with Section 19.590.707, Light and Glare, that contains regulations regarding the minimum and maximum lighting intensity requirements.</p>	<p><b>CM-AES-3:</b> Future development within the City of Colton would be required to comply with Chapter 18.42, Performance Standards, Section 18.42.090, Light, and Section 18.42.100, Glare, of the City of Colton’s Zoning Code that regulates lighting and glare.</p> <p><b>CM-AES-4:</b> Per the City of Colton’s standard practice, future solar development shall undergo discretionary architectural and site plan review and approval to ensure the inclusion of adequate design measures to avoid visual impacts. This review shall ensure that the tilt angle and the angle of the solar arrays would be adjusted during the design phase to minimize glare experienced at uses in the vicinity to the satisfaction of the City of Colton.</p>	NA
<b>Air Quality</b>		
<p><b>CM-AQ-1: Fugitive Dust Control.</b> Prior to the issuance of a grading permit for a project within the Northside Specific Plan, grading plans shall identify dust control measures consistent with SCAQMD Rule 403, with a goal of retaining dust on the site.</p> <p><b>CM-AQ-2: Architectural Coating VOC Emissions.</b> Prior to the issuance of a building permit for a project within the Northside Specific Plan, building plans shall identify the VOC content limits for architectural coatings consistent with SCAQMD’s Rule 1113 (Architectural Coatings) on the building plans.</p> <p><b>CM-AQ-3: Title 24 Building Energy Efficiency Standards.</b> Prior to the issuance of a building permit, building plans shall demonstrate compliance with the Title 24 Building Energy Efficiency Standards applicable at the time of project implementation.</p>		

Table 2-6. Compliance Measures

Jurisdiction	
<i>City of Riverside</i>	<i>County of Riverside</i>
<p><b>CM-AQ-4: Air Quality Management District Compliance.</b> Future developments involving stationary and area sources of air pollutant emissions developed under the Northside Specific Plan shall comply with applicable SCAQMD rules and regulations, obtain a permit from the SCAQMD to construct and a permit to operate. Prior to issuance of occupancy permits, future commercial and industrial businesses shall obtain applicable permits from South Coast Air Quality Management District.</p>	
<p><b>CM-AQ-5: Transportation Demand Management Regulations.</b> Prior to issuance of a certificate of occupancy, future development projects within the City of Riverside shall comply with the City of Riverside Municipal Code Chapter 19.880, and shall prepare a transportation demand management plan as applicable.</p>	<p><b>CM-AQ-6: Vehicle Miles Travelled Guidelines - Transportation Demand Management.</b> Per the City of Colton Vehicle Miles Traveled (VMT) Guidelines, future development shall reduce trip lengths and / or number of trips to a project using Transportation Demand Management (TDM) measures as applicable.</p>
<p><b>CM-AQ-7: Transportation Demand Management Regulation.</b> Prior to issuance of a certificate of occupancy, future development projects within the County of Riverside shall comply with the County of Riverside Ordinance No. 726, and shall prepare a transportation demand management plan as applicable.</p>	
<i>Biological Resources</i>	
<p><b>CM-BIO-1:</b> Future development shall comply with the federal Endangered Species Act (FESA). Typically, future development that would result in “take” of any federally listed threatened or endangered species would be required to obtain authorization from the National Marine Fisheries Service and/or the U.S. Fish and Wildlife Service (USFWS) through either Section 7 (if there is a federal nexus) or Section 10(a) (incidental take permit). However, FESA does not protect plants unless there is a federal nexus.</p>	
<p><b>CM-BIO-2:</b> Future development shall comply with the requirements of the wetland regulatory agencies and obtain permits, when applicable, including the following permits: (1) a Section 404 permit from the U.S. Army Corps of Engineers; (2) a Section 401 permit from the Regional Water Quality Control Board; and (3) a Streambed Alteration Agreement from the California Department of Fish and Game.</p>	
-	<p><b>CM-BIO-3:</b> Future development within the City of Colton shall obtain permits from the City’s Public Works Director for any impacts to trees, shrubs, or plants covered under Municipal Code 12.20 as described in section 12.20.040 of the code.</p>
<p>-</p>	
<i>Cultural Resources</i>	
<p><b>CM-CUL-1</b> <b>Inadvertent Discovery of Human Remains.</b> Prior to issuance of any grading permit within the Northside Specific Plan, the applicable jurisdiction (City of Riverside, City of Colton or County of Riverside) shall verify the grading plan states the following:</p>	

Table 2-6. Compliance Measures

Jurisdiction	
<i>City of Riverside</i>	<i>City of Colton</i>
<i>County of Riverside</i>	
<p>In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the applicable County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.</p>	
<i>Geology and Soils</i>	
<p><b>CM-GEO-1:</b> Prior to the issuance of any building permit for projects, it shall be confirmed that future building plans shall be prepared in accordance with the California Building Code, including (but are not limited to) the requirements for foundation and soil investigations (Sections 1803 and 1803A); excavation, grading, and fill (Sections 1804 and 1804A); damp-proofing and water-proofing (Sections 1805 and 1805A); allowable load-bearing values of soils (Sections 1806 and 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Sections 1807 and 1807A), and foundations (Sections 1808 and 1808A); and design of shallow foundations (Sections 1809 and 1809A) and deep foundations (Sections 1810 and 1810A). Future building plans shall also specifically confirm to the California Green Building Standards Code standards.</p>	
<p><b>CM-GEO-1a:</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the City of Riverside Building Code.</p>	<p><b>CM-GEO-1b:</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the City of Colton Building Code.</p>
<p><b>CM-GEO-1c:</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the County of Riverside Building Code.</p>	<p><b>CM-GEO-1c:</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the County of Riverside Building Code.</p>
<p><b>CM-GEO-2a:</b> Prior to the issuance of any grading permit, it shall be confirmed that grading plans shall be prepared in accordance with the City of Riverside Municipal Code, including Riverside Municipal Code Title 17 and 18 pertaining to grading requirements. In addition, grading shall adhere to the City's General Plan 2025 Public Safety</p>	<p><b>CM-GEO-2b:</b> Prior to the issuance of any grading permit, it shall be confirmed that grading plans shall be prepared in accordance with the City of Colton Municipal Code Chapter 16.72, Grading and Erosion Control. In addition, grading shall adhere to the City of Colton General Plan Safety Element policies related to</p>
<p><b>CM-GEO-2a:</b> Prior to the issuance of any grading permit, it shall be confirmed that grading plans shall be prepared in accordance with the County of Riverside Municipal Code, Fault Ordinance, and General Plan Safety Element policies S 2.1 to 2.7 and S 3.1 to 3.8.</p>	<p><b>CM-GEO-2c:</b> Prior to the issuance of any grading permit, it shall be confirmed that grading plans shall be prepared in accordance with the County of Riverside Municipal Code, Fault Ordinance, and General Plan Safety Element policies S 2.1 to 2.7 and S 3.1 to 3.8.</p>

**Table 2-6. Compliance Measures**

Jurisdiction		
<i>City of Riverside</i>	<i>City of Colton</i>	<i>County of Riverside</i>
Element Objectives PS-1 and associated Policies PS1.1, 1.2, and 1.4.	inspections of building sites related to geologic concerns.	
<i>Hazards and Hazardous Materials</i>		
<b>CM-HAZ-1:</b>	All businesses shall comply with a California Health and Safety Code (HSC), Division 20, Chapter 6.95, Sections 25500–25520, and shall prepare and implement a hazardous materials business plan in coordination with the appropriate Certified Unified Program Agency.	
<b>CM-HAZ-2:</b>	The transport of hazardous materials shall be in compliance with Title 13 CCR, Division 2, Chapter 6 of the California Highway Patrol, which requires safety measures and labels to identify and safely transport hazardous materials.	
<b>CM-HAZ-3:</b>	Prior to the issuance of any demolition permit of a structure built before 1978, lead-based paint (LBP) testing shall be completed to determine if any surface coatings contain lead equal to or greater than 1.0 milligram per square centimeter of surface area, or 0.5 percent by weight or 5,000 parts per million by weight, as defined by the USEPA mandating licensed abatement actions. If testing identifies the presence of LBP above these thresholds, then activities shall follow applicable sections in OSHA 29 CFR 1910.1025, 29 CFR 1926.62, the EPA Renovation, Repair and Painting (RRP) Rule and the SI Construction Specification Section 028300, “Work Activities Impacting Lead Containing Materials”. Requirements outlined in HUD 24 CFR Part 35 Lead Safe Housing Rule shall apply for activities conducted in residential housing. Abatement and interim control work that disturbs LBP on more than 2 square feet of interior surface, 20 square feet on exterior surfaces, or 10 percent of the total surface area on an interior or exterior type of component with a small surface area shall be completed by a certified and licensed lead abatement contractor.	
<b>CM-HAZ-4:</b>	Prior to the issuance of any demolition permit of a structure built before 1989, asbestos-containing material (ACM) testing shall be completed to determine if asbestos is present at a rate over 1 percent. If ACMs are present, then activities shall be required to comply with the Environmental Protection Agency Asbestos Worker Protection Rule (40 CFR Part 763, Subpart G), and Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) Regulations (40 CFR Part 61, Subpart M), as well as Occupational Safety and Health Administration general regulations regarding asbestos (29 CFR 1910.1001) and construction standards (29 CFR 1926.1101).	
<b>CM-HAZ-5:</b>	Prior to the issuance of any building permit or site entitlements for future development occurring within designated Zone E or Airspace Protection Surfaces for the March Air Reserve Base, the City of Riverside shall review and ensure consistency with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.	
<i>Hydrology and Water Quality</i>		
<b>CM-HYD-1:</b>	Prior to the issuance of a construction permit for an area over one acre, all future development shall prepare a Stormwater Pollution Prevention Plan that identifies Best Management Practices to be implemented to control runoff and water quality in compliance with the Regional Water Quality Control Board Construction General Permit in effect at the time of permit issuance.	
<b>CM-HYD-2a:</b>	Prior to the issuance of a construction permit for priority projects as defined by the Regional Water Quality Control	<p><b>CM-HYD-2b:</b> Prior to the issuance of a construction permit for priority projects as defined by the Regional</p> <p>See <b>CM-HYD-2a.</b></p>

**Table 2-6. Compliance Measures**

Jurisdiction	<i>City of Riverside</i>	<i>City of Colton</i>	<i>County of Riverside</i>
<p>Board, a final Water Quality Management Plan shall be prepared and Low Impact Development (LID) measures shall be included pursuant to the applicable NPDES MS4 Permit in effect at the time of permit issuance.</p> <p>For portions of the SPA located in Riverside County, Low Impact Development (LID) features shall be included in the design of individual projects proposed under the Northside Specific Plan. The LID features shall be designed to maximize infiltration, harvest/reuse, evapotranspiration, and treatment, consistent with the Design Handbook for Low Impact Development Best Management Practices (County of Riverside 2011), Water Quality Management Plan for the Santa Ana Region of Riverside County (County of Riverside 2012), and California Green Building Standards Code (CalGreen 2019). The design shall include Source Control and Treatment Best Management Practices (BMPs) and an Operations &amp; Maintenance Plan for the proposed BMPs. The LID features shall address long-term effects on water quality within the Santa Ana River Watershed and ensure BMPs and LID designs minimize potential water quality concerns to the maximum extent practicable.</p>	<p>Water Quality Control Board, a Water Quality Management Plan shall be prepared and Low Impact Development (LID) measures shall be included pursuant to the applicable NPDES MS4 Permit in effect at the time of permit issuance. For portions of the SPA located in San Bernardino County, LID features shall be included in the design of individual projects proposed under the Northside Specific Plan. The LID features shall be designed to maximize infiltration, harvest/reuse, evapotranspiration, and treatment, consistent with the City of Colton Water Quality Management Plan Procedures (City of Colton 2003), the Technical Guidance Document for Water Quality Management Plans (WQMP) (County of San Bernardino Stormwater Program 2011), and California Green Building Standards Code (CalGreen 2019). The design shall include Source Control and Treatment BMPs and an Operations &amp; Maintenance Plan for the proposed BMPs. The LID features shall address long-term effects on water quality within the Santa Ana River Watershed and ensure BMPs and LID designs minimize potential water quality concerns to the maximum extent practicable.</p>		

Table 2-6. Compliance Measures

Jurisdiction		
<i>City of Riverside</i>	<i>City of Colton</i>	<i>County of Riverside</i>
<b>CM-HYD-3a:</b> Prior to issuance of a grading permit, future projects shall comply with the RCFC&WCD Hydrology Manual (RCFC&WCD 1978) to control hydrology and drainage in accordance with the Riverside County Ordinance 460.	<b>CM-HYD-3b:</b> Prior to issuance of a grading permit, future projects shall comply with the San Bernardino County Flood Control District Hydrology Manual (1986) and Amendment (2010) to control hydrology and drainage.	See <b>CM-HYD-3a</b>
<b>Noise</b>		
<b>CM-NOI-1:</b> Prior to approval of development entitlements, the applicant shall complete a site-specific noise analysis to demonstrate compliance with the City's General Plan 2025 Noise Element Land Use Compatibility for Community Noise Exposure standards, as deemed necessary by the City of Riverside.	<b>CM-NOI-2:</b> Prior to the approval of development entitlements, the applicant shall complete a site-specific noise analysis, as deemed necessary by the City of Colton. to demonstrate compliance with Colton's General Plan Noise Element Land Use Compatibility criteria.	<b>CM-NOI-3:</b> Prior to the approval of development entitlements , the applicant shall complete a site-specific noise analysis, as deemed necessary by the County of Riverside. to demonstrate compliance with the County's General Plan Noise Element Land Use Compatibility for Community Noise Exposure guidelines.
<b>CM-NOI-4:</b> Prior to the approval of development entitlements, the applicant shall complete a site-specific noise analysis, as deemed necessary by the City of Riverside. to demonstrate compliance with Riverside's Municipal Code Sections 7.25.010 and 7.30.015.	<b>CM-NOI-5:</b> Prior to approval of development, the applicant shall complete a site-specific noise analysis to demonstrate compliance with the City of Colton Municipal Code Sections 18.42.040 and 18.42.050.	<b>CM-NOI-6:</b> Prior to approval of development, the applicant shall complete a site-specific noise analysis to demonstrate compliance with the County of Riverside Ordinance 847.
<b>Public Services</b>		
None	<b>CM-SRV-1:</b> Prior to the issuance of any building permit, the applicant shall provide the appropriate payment of Developer Impact Fees as well as Water and Wastewater Capacity Fees stipulated by the City of Colton's	<b>CM-SRV-2:</b> Prior to the issuance of any building permit, the applicant shall provide the appropriate payment of Developer Impact Fees towards police, fire, and library services stipulated by the

Table 2-6. Compliance Measures

Jurisdiction		
<i>City of Riverside</i>	<i>City of Colton</i>	
<i>County of Riverside</i>		
	Impact Fee Summary City of Colton's Municipal Code Section 12.32 and associated Ordinance 02-20.	County of Riverside Municipal Code Section 4.60.070.
<b>CM-SRV-3:</b> Prior to the issuance of a building permit, the applicant shall provide the payment of applicable school fees in accordance with Senate Bill 50 and Government Code Section 65995.		
<b>Recreation</b>		
<b>CM-REC-1a:</b> Prior to the issuance of any building permit, the applicant shall provide the appropriate payment or allocation of parkland in lieu of payment as stipulated by the Local Park and Development fee in the City of Riverside's Municipal Code, Chapter 16.60.	<b>CM-REC-2:</b> Prior to the issuance of any building permit, the applicant shall provide the appropriate payment or allocation of parkland in lieu of payment as stipulated by the park impact fee in the City of Colton's Municipal Code, Chapter 16.58.	<b>CM-REC-3:</b> Prior to the issuance of any building permit, the applicant shall provide the appropriate payment as stipulated by the development impact fee in the County of Riverside Municipal Code Section 4.60.070.
<b>CM-REC-1b:</b> Prior to the issuance of any building permit, the applicant shall provide the appropriate payment or allocation of land in lieu of payment as stipulated by the Trails Development fee in the City of Riverside's Municipal Code, Chapter 16.76.		
<b>Utilities and Service Systems</b>		
<b>CM-US-1a:</b> Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Subdivision Code Drainage Fees in the City of Riverside's Municipal Code, Title 18.	<b>CM-US-1b:</b> Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Storm Drain Facilities Fee for Drainage Benefit Area No.1 in the City of Colton's Municipal Code, Chapter 12.34.	<b>CM-US-1c:</b> Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Determination of Charges for Sewer and Domestic Water Services in the County of Riverside's Municipal Code, Chapter 4.48.070.

Table 2-6. Compliance Measures

Jurisdiction		
<i>City of Riverside</i>	<i>City of Colton</i>	<i>County of Riverside</i>
<b>CM-US-2a:</b> Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Sewer Service Charges in the City of Riverside's Municipal Code, Chapter 14.04.	<b>CM-US-2b:</b> Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Sewer Service Charges in the City of Colton's Municipal Code, Chapter 13.16, and appropriate water and wastewater fees (City of Colton 2016a, b).	<b>CM-US-2c:</b> Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Fees (for drainage) in the County of Riverside's Municipal Code, Chapter 12.08.070.
<b>CM-US-3a:</b> Prior to the issuance of any construction permit, the applicant shall abide by the guidelines as stipulated in the Wireless Telecommunication Facilities in the City of Riverside's Municipal Code, Chapter 19.530.	<b>CM-US-3b:</b> Prior to the issuance of any construction permit, the applicant shall abide by the guidelines as stipulated in the Telecommunication and Antenna Towers in the City of Colton's Municipal Code, Chapter 18.39.	
<i>Wildfire</i>		
<b>CM-WDF-1a:</b> Prior to the issuance of any building permit, it shall be confirmed that the operations of the development is in accordance with the City of Riverside 2017 Emergency Operations Plan for all construction and operation.	<b>CM-WDF-1b:</b> Prior to the issuance of any building permit, it shall be confirmed that the operations of the development is in accordance with the Mitigation Actions included in Table 6-2 of the City of Colton Local Hazard Mitigation Plan.	<b>CM-WDF-1c:</b> Prior to the issuance of any building permit, it shall be confirmed that the operations of the development is in accordance with the goals, and objectives included in Section 8.0 of the Riverside Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan.
<b>CM-WDF-2a:</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the City of Riverside Fire Code.	<b>CM-WDF-2b:</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the City of Colton Fire Code.	<b>CM-WDF-2c:</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the County of Riverside Uniform Fire Code.
<b>CM-WDF-3a:</b> Prior to project approval, the applicant shall submit a Fire Protection Plan for	<b>CM-WDF-3b:</b> Prior to project approval, the applicant shall submit a Fire	<b>CM-WDF-3c:</b> Prior to project approval, the applicant shall submit a Fire

**Table 2-6. Compliance Measures**

Jurisdiction		
<i>City of Riverside</i>	<i>City of Colton</i>	<i>County of Riverside</i>
approval by the City of Riverside Fire Department that demonstrates that the proposed development can provide fire services that meet the minimum travel times identified in City of Riverside General Plan, which is 5 minutes for Riverside's urbanized areas.	Protection Plan for approval by the City of Colton Development Services Department that demonstrates that the proposed development complies with fire safety standards identified in Title 15 of the Colton Municipal Code and State Wildland-Urban Interface code requirements.	Protection Plan for approval by the County of Riverside Development Services Department that demonstrates that the proposed development can provide fire services that meet the minimum travel times identified in Riverside County Fire Department Fire Protection and EMS Strategic Master Plan.
<b>CM-WDF-4:</b> Prior to the issuance of any building permit, it shall be confirmed that building plans are in accordance with the Compliance with 2019 California Fire Code Standards (such as incorporation of sprinklers, maintenance of all flammable vegetation or other combustible growth within 30 feet of buildings, and other building code requirements).		
<b>CM-WDF-5:</b> Prior to the issuance of any building permit, it shall be confirmed that all dead-end fire access roads in excess of 150-feet in length shall be provided with approved provisions that allow emergency apparatus to turn around. A cul-de-sac shall be provided in residential areas where the access roadway serves more than two structures. The minimum, unobstructed paved radius width for a cul-de-sac shall be provided in accordance with each jurisdiction's standards applicable at the time of approval.		
<b>CM-WDF-6:</b> Prior to the issuance of any building permit, it shall be confirmed that all fuel modifications shall be installed prior to the final inspection for issuance of a certificate of occupancy. Roadway access, water supply system, and vegetation fuel modification of common roadway access areas shall be completed in each phase before a building permit is issued for any parcel within the phase.		

Draft EIR Section 2.4.4, Implementation, was updated to reflect the following updates from the Northside Specific Plan:

#### **Implementation of the Northside Specific Plan**

Approval of final development plans and use permits shall be contingent upon a determination of substantial compliance with the applicable provisions of this Specific Plan, applicable provisions of the Zoning Code, and the City of Riverside or City of Colton General Plans.

Draft EIR Section 2.4.4, Implementation, (Draft EIR page 2-32) was updated to reflect the deletion of the following from the Northside Specific Plan:

### Section 3.1 – Aesthetics

In response to City comments, MM-AES-1 in Section 3.1.5, Mitigation Measures, was updated as detailed Table S-3, Summary of Significant Effects and Mitigation Measures, above (see Executive Summary).

### Section 3.2 – Air Quality

In response to comments and for clarifications, the air quality mitigation measures were updated in Section 3.2.5, Mitigation Measures. To reduce repetition, refer to Table S-3, Summary of Significant Effects and Mitigation Measures, above (see Executive Summary) for the changes to the mitigation measures. More specifically, MM-AQ-1, MM-AQ-2 and MM-AQ-11 were updated in response to SCAQMD comments. In addition, the Draft EIR included a vehicle miles traveled reduction strategies mitigation measure (former MM-AQ-4) that called for the preparation of transportation demand management program. This measure was eliminated, as it was determined each jurisdiction already include regulations pertaining to the preparation of transportation demand management plans. This change is also reflected by the deletion of MM-AQ-4 and renumbering of the subsequent measures. Instead, compliance measures CM-AQ-5 to 7 were added to identify that future projects would be required to comply with the applicable jurisdiction's requirement to prepare and comply with a transportation demand management plan. This change included the addition of the compliance measure to the project description (see Chapter 2 discussion above) as well as the addition of the following sentence to the fifth paragraph in the operational emissions analysis in EIR Section 3.2.4, Impact Analysis:

Future projects would also be required to comply with each jurisdiction's requirements to prepare transportation demand management plans as applicable (**CM-AQ-5**, **CM-AQ-6**, and **CM-AQ-7**).

### Section 3.3– Biological Resources

The introductory impact statements throughout Section 3.3.4, Impact Analysis, that state “Less than Significant Impact with Mitigation Incorporated” were updated to “Potentially Significant” consistent with the analysis presented within those sections, as well as consistent with Section 3.3.6, Significance After Mitigation, and the Executive Summary.

In response to the California Department of Fish and Wildlife comments on the Draft Program EIR as well as the City of Riverside additional clarifications, updates to mitigation measures MM-BIO-1a to MM-BIO-14a were

completed. Refer to Table S-3, Summary of Significant Effects and Mitigation Measures, in the Executive Summary updates for the changes to the mitigation measures.

## Section 3.4 – Cultural Resources

Information for site 33-006973 in Table 3.4-2, Previously Recorded Cultural Resources Within the SPA, was updated based on comments, as follows (note only the row being updated is included herein due to the size of the table):

**Table 3.4-2. Previously Recorded Cultural Resources Within the SPA**

Primary Number	Trinomial (CA-)	Period	NRHP/CRHR Status*	Recorded Year/By	Description	Proximity
<i>Sites Within Riverside County</i>						
33-006973	—	Historic Structure	6Z (Found ineligible for NR, CR or Local designation through survey evaluation)	2015 CRM Tech; 1982 T. Newman	Building: Single-family property (c. 1922)	Subarea 4

The discussion of SPA impacts in Subarea 4 in Section 3.4.4, Impacts Analysis, was updated based on comments, as follows (note only the paragraphs being updated are included herein):

### Subarea 4

Subarea 4 encompasses approximately 15 acres, to the east of Subarea 3. The area has historically been used as agricultural ranching, and the current land use designation for Subarea 4 is Business/Office Park, however there are currently no Business/Office Park properties in Subarea 4 (City of Riverside 2007).

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

The Northside Specific Plan would redesignate land uses in Subarea 4 to Medium High Density Residential, which would yield 432 dwelling units based on a density of 18 du/ac. Subarea 4 would be subject to the Transition Zone Overlay, which would allow for the existing uses to continue to operate under a Business/Office Park land use designation, and would also allow for the expansion of light industrial and office uses similar to the existing developments on the west side of Main Street (Subarea 15). Since 3667 Placentia Lane (P-33-006973) was determined to not be a historic resource for the purposes of CEQA, the

change in use will not impact historic resources. No other potential resources were identified in Subarea 4. Thus, no impacts to historical resources are expected within Subarea 4.

In response to comments on the Draft Program EIR from the City, the updates were made to the cultural resources mitigation measures. Refer to Table S-3, Summary of Significant Effects and Mitigation Measures, in the Executive Summary updates for the changes to the mitigation measures.

## Section 3.5 – Energy

There are no changes to this chapter of the Draft Program EIR.

## Section 3.6 – Geology and Soils

In response to comments on the Draft Program EIR from the City, the updates were made to the geology and soils mitigation measure. Refer to Table S-3, Summary of Significant Effects and Mitigation Measures, in the Executive Summary updates for the changes to the mitigation measure.

## Section 3.7 – Greenhouse Gas Emissions

There are no changes to this chapter of the Draft Program EIR.

## Section 3.8 – Hazards and Hazardous Materials

Section 3.8.2, Relevant Plans, Policies, and Ordinances, was updated on Draft Program EIR page 3.8-16 with the following information:

### ***City of Colton Local Hazard Mitigation Plan***

The LHMP for the City of Colton was adopted on August 6, 2019 (City of Colton 2018). The LHMP summarizes the emergency management cycle of response, recovery, mitigation, and preparedness for the City of Colton. The portion of the SPA that falls within the City of Colton (Subareas 1 and 2) is under the jurisdiction of the City of Colton LHMP.

## Section 3.9 – Hydrology and Water Quality

In coordination with the Riverside County Flood Control District and the City of Riverside Public Utilities Department as well as the project Engineers (Rick Engineering), revisions were made to the Draft EIR Hydrology and Water Quality Section of the EIR. Information regarding two additional regulatory agencies was added into Section 3.9.2 of the EIR, as follows:

### ***Riverside County Flood Control and Water Conservation District***

The Riverside County Flood Control and Water Conservation District (RCFC&WCD) is a regional flood management authority for Western Riverside County. The RCFC&WCD is divided into seven geographic areas, with the Northside Specific Plan located partially within Zone 1. The area of the Specific Plan outside of Zone 1 is within the County of San Bernardino, which is overseen by the San Bernardino County Flood

Control District (see below). Within Zone 1, the SPA is partially within the University Master Drainage Area. This University Master Drainage Plan (Riverside County Flood Control District 1967) identifies several proposed storm drains in addition to existing stormdrains within the SPA. The County of Riverside Ordinance No. 460 allows for fees to be collected towards these improvements; however, there is no fee currently set up for the University Area Drainage Plan (see Section 10.25 of County of Riverside Ordinance No. 460).

### ***San Bernardino County Flood Control District***

The San Bernardino County Flood Control District (SBCFCD) is a part of the County of San Bernardino's Department of Public Works. As the counterpart to the RCFC&WCD, the SBCFCD is responsible for constructing and maintaining flood control infrastructure in the County of San Bernardino. This includes the Seven Oaks Dam as well as drainage channels throughout the City of Colton.

Additional edits were made to the environmental analysis under Hydrology and Water Quality threshold (b) in Section 3.9.4 of the EIR, as follows:

Creation of additional impermeable surfaces in association with SPA development could exacerbate this existing flooding issue. Future development would be required to comply with the applicable MS4 permits and associated LID requirements to control runoff (**CM-HYD-2a** and **CM-HYD-2b**). In addition, future development would comply with mitigation measures requiring upgrades to the storm drain system within the SPA (**MM-HYD-4**) and completion of project-specific hydrology/drainage reports, requiring reduction of post-construction runoff to less than or equal to existing conditions (**MM-HYD-5**). Depending on the applicable jurisdiction, future projects are required to be designed in accordance with the RCFC&WCD Hydrology Manual (RCFC&WCD 1978) or San Bernardino County Flood Control District Hydrology Manual (San Bernardino County Flood Control District 1986) as Amended (San Bernardino County Flood Control District 2010) to control hydrology (**CM-HYD-3a** and **CM-HYD-3b**). Regardless of the control of runoff rates to pre-existing conditions or better, overall volumes are expected to increase. Under flooding condition, this volume contribution would be significant considering it would increase the flooding area. Adherence to MS4 requirements, in combination with mitigation to reduce project-level drainage impacts, would reduce significant impacts related to flooding to a degree, but cannot guarantee that all combined project-level impacts would be below a level of significance. Thus, drainage impacts would be significant and unavoidable (**Impact HYD-1**).

### **Springbrook Wash**

FEMA has mapped this drainage as a Zone AE drainage system, which is designed to convey a 100-year peak flow rate of 1,000 cfs. However, the existing trapezoidal earthen channel between Orange Street and Main Street is only capable of conveying approximately 100 cfs, resulting in frequent channel overtopping, even during relatively small storm events, thereby flooding adjacent developments. Based on a preliminary hydraulic analysis by the Riverside County Flood Control and Water Conservation District, the confluence 100-year peak flow rate in Springbrook Wash, south of Garner Road, is approximately 1,500 cfs, which is roughly a 50% increase from FEMA's peak flow rate of 1,000 cfs. This substantially exceeds the capacity of the existing Springbrook Wash channel and creates two flow paths through the Old Golf Course, including one flowing along the western limit of the Old Golf Course and the second meandering through the middle of the Old Golf Course (Figure 3.9-5, Hydrology Analysis Flood Map). Many of these flooded areas are not currently mapped within the FEMA 100-year floodplain. Creation of additional impermeable surfaces in

association with SPA development could exacerbate this existing flooding issue without increases to conveyance areas and/or onsite detention of runoff peak flow rate and volumes back to pre-project levels.

In addition, a preliminary hydraulic analysis by the Riverside County Flood Control and Water Conservation District does not extend downstream from the confluence with University Wash, thus, the floodplain mapping is not currently available (Figure 3.9-5, Hydrology Analysis Flood Map). It is anticipated that the remainder of Springbrook Wash leading up to Lake Evans may not have sufficient capacity for the anticipated 1,500 cfs flows and therefore will have similar flooding issues (Appendix F, Hydrology and Water Quality Letter Report). Therefore, creation of additional impermeable surfaces in association with SPA development could also exacerbate this existing flooding issue if runoff peak flow rates and volumes are not controlled.

As stated above, development would be required to comply with the applicable MS4 permits and associated LID requirements to control runoff (**CM-HYD-2a**, **CM-HYD-2b**, **CM-HYD-3a**, and **CM-HYD-3b**). In addition, future development would comply with **MM-HYD-4** and **MM-HYD-5**. Adherence to MS4 requirements in combination with mitigation to reduce project-level drainage impacts, would reduce significant impacts related to flooding to a degree, but cannot guarantee that all combined project-level impacts would be below a level of significance. Thus, drainage impacts would be significant and unavoidable (**Impact HYD-2**).

#### **Other Specific Plan Area Drainages**

The northern approximate half of the SPA contains very limited storm drain systems. Stormwater runoff occurs primarily along streets and as overland sheet flow in undeveloped areas. Creation of additional impermeable surfaces in association with SPA development without control of runoff volumes and rates could exacerbate the existing potential for flooding in these areas. As stated above, development would be required to comply with the applicable MS4 permits and associated LID requirements to control runoff (**CM-HYD-2a** and **CM-HYD-2b**). In addition, future development would comply with **MM-HYD-4** and **MM-HYD-5**. Adherence to MS4 requirements, in combination with mitigation to reduce project-level drainage impacts, would reduce significant impacts related to flooding to a degree, but cannot guarantee that all combined project-level impacts would be below a level of significance. Thus, drainage impacts would be significant and unavoidable (**Impact HYD-3**).

Additional edits were made to the environmental analysis under Hydrology and Water Quality threshold (c) in Section 3.9.4 of the EIR, as follows:

**Significant and Unavoidable.** As discussed for Threshold (b), Highgrove Channel and Springbrook Wash are subject to flooding and the northern half of the SPA is generally lacking local storm drain infrastructure. As is, runoff is primarily conveyed along streets until it reaches a defined drainage channel. In addition, much of the existing development predates the storm water quality treatment requirements currently in effect today for new development and redevelopment projects. Also, the SPA is lacking regional detention basins, which could potentially be used for stormwater quality treatment. While the project proposes to improve the Springbrook Arroyo through Subarea 8 that would reduce flooding issues, this improvement is not fully funded or guaranteed to be completed at this time, the completion of this improvement may not occur prior to additional development occurring and this improvement would not resolve all flooding issues. Proposed Specific Plan related development and redevelopment could exacerbate current deficiencies in stormwater infrastructure by creation of additional impervious surfaces, potentially resulting in contribution of runoff water that would exceed the capacity of existing or planned drainage systems, and provide additional

sources of polluted runoff. Adherence to applicable MS4 permits and associated LID requirements to control runoff (CM-HYD-2a, CM-HYD-2b, CM-HYD-3a, and CM-HYD-3b), would reduce drainage impacts, but cannot guarantee that all future combined project-level impacts would be below a level of significance. Therefore, impacts are considered potentially significant and unavoidable (Impact HYD-4).

Additional edits were made to the environmental analysis under Hydrology and Water Quality threshold (d) in Section 3.9.4 of the EIR, as follows:

**Significant and Unavoidable.** The Riverside County Flood Control and Water Conservation District is currently processing a Physical Map Revision through FEMA to update both the hydrologic and hydraulic analysis for the Santa Ana River to reflect changes related to the construction of the Seven Oaks Dam upstream. The SPA is protected by the Riverside 2 Levee System, located along the eastern bank of the Santa Ana River, which is currently a provisionally accredited levee pursuant to the current FEMA FIRM.

In addition, as previously discussed, neither the Highgrove Channel nor the Springbrook Wash can currently accommodate a 100-year flood event; therefore, portions of the SPA are located within a 100-year flood zone (Figure 3.9-4, FEMA Flood Map). Flood waters that exceed the channels would flow southward as unchannelized, wide spreading runoff. This runoff would likely have negative flooding impacts on the downstream reach of Springbrook Wash through the length of the SPA. Build-out of the undeveloped land and the increase in urbanization of previously developed land would potentially impede or redirect flood flows if the volumes and runoff rates were not controlled or if drainage facility improvements are not completed. Adherence to applicable MS4 permits and associated LID requirements to control runoff (**CM-HYD-2a, CM-HYD-2b, CM-HYD-3a, and CM-HYD-3b**), as well as determining flood levels throughout the SPA (**MM-HYD-6**), would reduce flooding impacts, but cannot guarantee that all future project-level impacts or combined project-level impacts of the Northside Specific Plan would be below a level of significance. Impeding and/or redirecting flood flows could increase the potential for flooding downstream of proposed structures within the SPA. Therefore, impacts are considered significant and unavoidable (**Impact HYD-5**).

*In flood hazard, tsunami, or seiche zones, would the proposed plan risk release of pollutants due to proposed plan inundation?*

**Significant and Unavoidable.** The SPA is not located in proximity to the Pacific Ocean and therefore not subject to inundation by tsunami. Similarly, the SPA is not located in proximity to a standing body of water that might be susceptible to a seiche. However, portions of the SPA are located within a flood hazard zone, subject to possible inundation and channel overflow. The proposed Specific Plan would result in development and renovations adjacent to the 100-year flood hazard areas. Additionally, according to the City of Colton's Flood Zone Map, the proposed plan is susceptible to inundation if the Seven Oaks Dam were to fail. The actual area affected by any failure of Seven Oaks Dam would depend on the nature of the failure and the amount of water impounded by the dam at the time (City of Colton 2019). The proposed Specific Plan includes the build-out of industrial zones, which can use toxic chemicals and other materials that would be detrimental to the neighboring environment should flooding occur. Adherence to applicable MS4 permits and associated LID requirements to control runoff (**CM-HYD-2a, CM-HYD-2b, CM-HYD-3a, and CM-HYD-3b**), would reduce flooding impacts, but cannot guarantee that all future project-level impacts or combined project-level impacts of the Northside Specific Plan would be below a level of significance. As stated on page 5.8-23 of the General Plan EIR (City of Riverside 2007), "[e]ven though new development is required to be designed to avoid standard 100-year flood areas, new development within a dam inundation area could not be built to avoid flooding that would result from dam failure." Division 3 of the

California Water Code requires the State Division of Safety of Dams to be responsible for the safety of non-federal dams. As a part of that responsibility, this agency routinely inspects operating dams to ensure that they are adequately maintained in accordance with safety regulations to reduce the potential for dam failure. None-the-less, such maintenance would not eliminate the risk of dam failure. In addition, it is noted that California Civil Code Section 1103 through 1103.4 requires sellers notify potential buyers of potential flood hazards, including potential dam failure inundation, but such notification does not reduce or eliminate the potential impact. Therefore, impacts are considered significant and unavoidable (**Impact HYD-6**).

***Would the proposed plan conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

Less-than-Significant Impact. The proposed Specific Plan would be required to comply with the Santa Ana Watershed Protection Program, including the San Bernardino County MS4 Permit and Riverside MS4 Permit (CM-HYD-2a and CM-HYD-2b). In accordance with the City of Colton and City of Riverside requirements, projects proposed as part of the Northside Specific Plan would be required to implement a SWPPP during construction and a WQMP during operations to address water quality (**CM-HYD-1**, **CM-HYD-2a**, and **CM-HYD-2b**). These projects would be required to adhere to local, state, and federal standards to ensure that projects completed as part of the Northside Specific Plan would not conflict with or obstruct implementation of the Santa Ana RWQCB Basin Plan.

With respect to groundwater management, UWMPs completed by the RPU and the San Bernardino Valley Regional Water District have identified adequate supplies to meet anticipated water demands through 2040, during normal, single dry year, and multiple dry year scenarios. The SPA is also governed in accordance with the Groundwater Management Plan for the Riverside Groundwater Basin. The Riverside Public Utilities has several planned projects to meet future water demand needs of the proposed Specific Plan. As such, the proposed Specific Plan would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts are considered less than significant.

In addition to the revisions to the analysis, the hydrology and water quality mitigation measures were updated. Updates include the requirement to prepare and implement a Master Drainage Plan to address the needed hydrologic improvements. Refer to Table S-3, Summary of Significant Effects and Mitigation Measures, in the Executive Summary updates for the changes to the mitigation measure.

The following edits were made to Section 3.9.6 of the EIR:

**3.9.6 Level of Significance After Mitigation**

Flood control improvements of Highgrove Channel, University Wash, and Springbrook Wash, as outlined **MM-HYD-1a**, and **MM-HYD-1b** and **MM-HYD-1c**, would prevent continued flooding and prevent increased runoff and volumes associated with proposed development. The City has identified several potential options to ensure these improvements could be implemented (see **MM-HYD-1**), such as creating a Community Facilities District (CFD), Development Impact Fee, or collection of fees via the County of Riverside Ordinance 460 for regional storm drain improvements. However, at this time, there is no mechanism to ensure the improvements identified in **MM-HYD-1** to **MM HYD-3** would be completed. In addition, the mitigation would be under the jurisdiction of another agency. Specifically, these improvements would be under the control of the Riverside County Flood Control and Water Conservation District and FEMA. The City of Colton would also have to agree to implement the mitigation within their

jurisdiction. The City of Riverside cannot assure that those jurisdictions will permit the improvement to be made and cannot legally impose such mitigation. As such, flood related Impacts **HYD-1, HYD-2, HYD-3, and HYD-4** are considered significant and unavoidable.

In the case of the Santa Ana River, the segment of the Santa Ana River located adjacent to the Northside Specific Plan is within the City of Jurupa Valley. In addition, some of the flood areas are located in the City of Colton. Approvals would also be needed by FEMA and other agencies. The City of Riverside cannot assure that those jurisdictions will permit the improvement to be made and cannot legally impose such mitigation. As such, flood plain **Impact HYD-5** are considered significant and unavoidable. Storm drain enhancements and completion of project-specific hydrology/drainage analyses within the Northside Specific Plan Area, as outlined by **MM-HYD-3** and **MM-HYD-4**, would prevent flooding associated with increased impervious surfaces and associated increased runoff. In addition, determination of flood elevations, as outlined by **MM-HYD-5**, would ensure that new development would be constructed either (1) outside the 100-year FEMA flood plain or (2) a minimum of 2 feet above anticipated flood elevations, as determined by FEMA. As indicated previously, City of Riverside cannot assure that those jurisdictions will permit the improvement to be made and cannot legally impose such mitigation. Thus, **Impact HYD-5** is considered significant and unavoidable.

As stated in Section 3.9.4 above, new development within a dam inundation area cannot not be built to avoid flooding that would result from dam failure. Thus, as identified in the General Plan (City of Riverside 2007), **Impact HYD-6** related to potential inundation by the failure of Seven Oaks Dam would be significant and unavoidable.

## Section 3.10 – Land Use and Planning

Table 3.10-2 was updated per the City of Colton’s request, as follows (note due to the size of the table, only the row being updated is included herein:

**Table 3.10-2. Project Consistency with Applicable Plans**

General Plan Goal/Objective/Policy	Proposed Project Consistency
<i>City of Colton General Plan</i>	
<p><b>Goal LU-1:</b> Achieve a balance of land use types that create diverse opportunities for housing, employment, commerce, recreation, and civic engagement.</p>	<p><b>Consistent.</b> The proposed project includes general plan and zoning amendments within the Pellissier Ranch area, within the City of Colton to encourage development of a high-tech business park with riverfront housing opportunities and commercial development in close proximity to housing and jobs. Developers will pay a fair-share to expand existing infrastructure into the vacant portions of Pellissier Ranch (Policy LU-1.5). Green corridors would be developed adjacent to La Loma Hills and the Santa Ana River to provide a buffer between the urban and natural environments (Policy LU-1.8). A Transition Zone Overlay would apply to Subarea 1 to allow for transition of existing Business/Office Park (B/OP) land uses to High Density Residential (HDR) land uses (Policy LU-1.9). In addition, it is noted that the City of Colton has made progress on implementing their General Plan Goal LU-1 through the adoption of the Roquet Ranch Specific Plan.</p>

The last sentence in Section 3.10.1.2, Physical Conditions, (Draft EIR page 3.10-5) was updated to correct an error, as follows:

A breakdown of the theoretical yields of each existing land use within the SPA is shown in Table 3.10-1, Assumed Maximum Theoretical Yield for Existing Land Uses.

## Section 3.11 – Noise

The introductory impact statements throughout Section 3.11.4, Impact Analysis, that state “Less than Significant Impact with Mitigation Incorporated” were updated to “Potentially Significant” consistent with the analysis presented within those sections, as well as consistent with Section 3.11.6, Significance After Mitigation, and the Executive Summary.

Page 3.11-39, the following revisions were made:

Once operational, the new development implemented within the Northside Neighborhood and Pellissier Ranch Specific Plan would not be expected to feature major producers of enduring groundborne vibration. Anticipated mechanical systems like heating, ventilation, and air-conditioning units are designed and manufactured to feature rotating (fans, motors) and reciprocating (compressors) components that are well-balanced with isolated vibration within or external to the equipment casings. In addition, the allowed uses are not anticipated to include heavy industrial or manufacturing facilities that involve high-energy material-to-material impacts (and would thus resemble pile-drivers).

Groundborne vibration from roadway traffic is typically dependent on roadway conditions, since a bump or slight but abrupt change in surface elevation would cause the energetic impulse of a dropping vehicle (cushioned by tires and vehicle suspension). Hence, newer and/or well-maintained roadways that are smooth are likely to reduce these opportunities for vibration from traversing vehicles. Research from Henwood (FHWA 2001) provides measurements of groundborne vibration from different types of roadway traffic, including passenger cars, sports utility vehicles, and tow trucks. At reference peak particle velocities of up to 0.008 inches per second (ips) for the largest of these typical roadway vehicles at a reference distance of approximately 5 feet, there would be no risk of exceeding the Caltrans recommended threshold of 0.12 ips for historic structures. Similarly, a loaded truck has a reference vibration level of 0.076 ips PPV at a reference distance of 25 feet (FTA 2006). Similarly, the Henwood paper indicates that a loaded belly truck traveling at 30 miles per hour exhibits 0.348 ips PPV at a reference distance of 5 feet. Using the FTA-based vibration propagation algorithm, the predicted PPV at 11 feet would be 0.10 ips and thus below the 0.12 ips PPV Caltrans-based guidance threshold for historic structures. Considering typical roadway configurations that include parking, sidewalks, plant buffers, and/or bike lanes in addition to building setback requirements, the distance between a historic structure and a roadway with heavy truck traffic would be more than 11 feet and roadway traffic would generate less than 0.12 ips at adjacent historic buildings. For example, the historic Trujillo Adobe is located within the central area of its parcel, and located over 40 feet from any property line. In addition, Orange Street to the east would include a parkway that would be 13.5 feet wide. Considering this, the Trujillo Adobe would be well beyond 11 feet away from heavy vehicular traffic on adjacent roadways. Thus, no significant vibration impact is anticipated to occur as a result of roadway traffic.

On this basis, potential vibration impacts due to proposed project operation would be **less than significant**.

In response to City comments, MM-NOI-1 and MM-NOI-2 in Section 3.11.5, Mitigation Measures, were updated. Refer to Table S-3, Summary of Significant Effects and Mitigation Measures, in the Executive Summary updates for the changes to the mitigation measures.

## Section 3.12 – Population and Housing

In section 3.12.2, Relevant Plans, Policies, and Ordinances, the following sentence was added to the end of the second paragraph under the “City of Colton General Plan – Land Use Element (2013) heading (Draft Program EIR page 3.12-9) based on comments from the City of Colton:

The City of Colton’s General Plan – Land Use Element identifies the Pellissier Ranch/La Loma Hills area as a “Planning Focus Area”, and states that it “envisions [Pellissier Ranch] as a riverfront community consisting of low density and medium-density housing, schools and parks, trails, community facilities, and a commercial area serving the neighborhood. As mentioned earlier, the City of Colton’s General Plan – Land Use Element (2013) planned for increased intensities to meet their 5<sup>th</sup> Cycle RHNA housing needs. In total, 21,204 dwelling units is projected to occur within the City of Colton with implementation of the land use policies established by the Land Use Element. Most of the new development is intended to occur within the Pellissier Ranch area and the West Valley Specific Plan area (City of Colton 2013). Consistency with the Pellissier Ranch/La Loma Hills area as specified in the City of Colton’s General Plan has been addressed, in part, through the adoption of the Roquet Ranch Specific Plan.

## Section 3.13– Public Services

In Section 3.13.1, Existing Conditions, the second to last sentence in the third paragraph under the Colton Fire Department discussion was revised as follows based on comments from the City of Colton:

A 0.8 acre fire station site was proposed in the La Loma Hills region of the City of Colton as part of the approved Roquet Ranch Specific Plan (adopted by the City of Colton (Ordinance No. 07-047-18), on June 5, 2018), however the CFD has determined that this site is unsuitable for a fire station due to its location and topographical constraints.

## Section 3.14 – Recreation

The following change was made to the first sentence in Section 3.14.1.2, City of Colton, under the Parks discussion based on comments provided by the City of Colton:

The City of Colton has 11 parks that encompass approximately 43 acres of parkland (City of Colton n.d.a.). These parks include Elizabeth Davis Park, McKinley School Park, Fleming Park, Max J. Lofy Park, Cesar E. Chavez Park, Rich Dauer Park, Cooley Ranch Park, Prado Park, Veterans Park, and “N” Street Mini Parks (East and West) (City of Colton n.d.a.).

The row describing George Brown Park in Table 3.14-4, City of Colton Park and Recreational Facilities, was deleted based on comments provided by the City of Colton. Accordingly, the total acreage in this table was also updated to reflect 43.37 acres of total parkland in the City of Colton.

Table 3.14-4. City of Colton Park and Recreational Facilities

Park Sites	Location	Amenities	Total Acres
Cesar E. Chavez Park	600 Colton Avenue	Skate park, three community centers (the Gonzales Center, Hutton Center, Thompson Teen Center), playground area, large shelter with BBQ and multiple picnic tables throughout the park, restrooms, softball field, enclosed soccer area, water fountains, swimming pool (open May through September)	10.93
Cooley Ranch Park	2020 Duron Street	Basketball courts, shade covers, picnic tables, BBQ, water fountains	1.93
Elizabeth Davis Park	1055 West Laurel Drive	Basketball courts, tennis courts, playground area, two large shelters with BBQ, multiple picnic tables throughout the park, restrooms, softball field, water fountains	6.34
Fleming Park	525 North La Cadena Drive	Band shell, stage, multiple picnic tables throughout park, restrooms, water fountains	1.66
Max J. Lofy Park	351 East E Street	Baseball fields, lights, picnic tables, water fountains	0.69
N Street Mini Park (East and West)	Between 5th and 7th Streets	Benches, sheltered sitting area	0.75
Prado Park	3000 East Prado Lane	Play equipment, picnic, BBQ, playground area, shelter, water fountains	1.0
Rich Dauer Park	955 Torrey Pines Drive	Playground area, shelter area, picnic tables, BBQ, restrooms, water fountains	2.26
Veterans Park	290 East O Street	Baseball fields, softball fields, basketball courts, handball courts, play equipment, picnic tables, BBQ, Luque Community Center, Luque Library, splash pad, restrooms, water fountains	13.7
McKinley Playground	600 West Johnston Street	Baseball field, basketball courts, play equipment, picnic tables, playground area, water fountains	4.13
<b>Total Acreage</b>			<b>43.39</b>

Source: City of Colton n.d.b.

In Section 3.14.4, Impact Analysis, the second paragraph, (Draft Program EIR page 3.14-23) the figure reference was updated as follows:

The Northside Neighborhood and Pellissier Ranch Specific Plan includes a total of approximately 233 acres of parkland within the SPA, as shown in Figure 2-11, Proposed Open Space and Trails Map.

Program Draft EIR page 3.14-26, second to last paragraph, second sentence, was updated as follows:

The existing parkland acreage within the City of Colton is approximately 43 acres (3.14.1.2, City of Colton). Based on these numbers, the existing parkland ratio is approximately 0.78 acres of parkland per 1,000 residents.

Program Draft EIR page 3.14-27, the last sentence of the first paragraph was updated as follows:

Table 3.14-8, City of Colton Parkland Ratio Goals versus Parkland Ratios with Northside Neighborhood and Pellissier Ranch Specific Plan, shows that the parkland per resident ratio with implementation of the

Northside Neighborhood and Pellissier Ranch Specific Plan would increase from 0.78 acre per 1,000 residents to 1.98 acres per 1,000 residents.

Program Draft EIR page 3.14-27, Table 3.14-8. City of Colton Parkland Ratio Goals versus Parkland Ratios with Northside Neighborhood and Pellissier Ranch Specific Plan, was updated as follows:

**Table 3.14-8. City of Colton Parkland Ratio Goals versus Parkland Ratios with Northside Neighborhood and Pellissier Ranch Specific Plan**

Current Population (2018) <sup>1</sup>	Current Parkland Acreage	Parkland to Resident Ratio (Current Standard)	Existing Parkland to Resident Ratio	Population with implementation of Project (max) <sup>2</sup>	Total Parkland Acreage with implementation of Northside Neighborhood and Pellissier Ranch Specific Plan	Parkland to Resident Ratio with implementation of Northside Neighborhood and Pellissier Ranch Specific Plan
54,828	43	5 acres per 1,000 residents	0.78 acre per 1,000 residents	59,434	118	1.98 acres per 1,000 residents

Sources: SCAG 2019b, City of Colton n.d.a., 1987.

**Notes:**

- <sup>1</sup> Existing City population is assumed to be 54,828 (SCAG 2019b).
- <sup>2</sup> The Northside Neighborhood and Pellissier Ranch Specific Plan would add 2,961 to 4,606 persons to the City of Colton. With the addition of this population to the existing 54,828 (SCAG 2019b), the total City of Colton population with the implementation of the Northside Neighborhood and Pellissier Ranch Specific Plan was assumed to be 57,789 to 59,434 residents.

Program Draft EIR page 3.14-28, the second sentence of the second paragraph was updated as follows:

The parkland per resident ratio with implementation of the Northside Neighborhood and Pellissier Ranch Specific Plan would increase from 0.78 acre per 1,000 residents to 1.98 acres per 1,000 residents.

## Section 3.15 – Transportation

The reference in the first sentence on Program Draft EIR page 3.15-14 was corrected as follows:

The City of Colton’s General Plan Mobility Element (City of Colton 2016) establishes long-term goals and policies designed to improve the local transportation system and create options for residents to move about the City.

The following row in Table 3.15-20, Horizon Year 2040 Scenario 1 Without Orange Street Extension – Intersection Operations, was updated due to an error in the traffic model software to the following (note only the row being updated is included herein due to the size of the table):

**Table 3.15-20. Horizon Year 2040 Scenario 1 Without Orange Street Extension – Intersection Operations**

Intersection	Jurisdiction	Peak Hour	2040 without Project		2040 SP Scenario One		Change in Delay	Significant?
			DELAY	LOS	DELAY	LOS		
9 Main Street / Placentia Lane (U)	City of Riverside / City of Colton	AM peak	153.7	F	>200	F	NIA	YES
		PM Peak	>200	F	>200	F	NIA	YES

Figure 3.15-11 has been updated as requested by the City of Colton during public review to include a legend.

The following row in Table 3.15-22, Horizon Year 2040 Scenario 1 With Orange Street Extension – Intersection Operations, was updated due to an error in the traffic model software to the following (note only the row being updated is included herein due to the size of the table):

**Table 3.15-22. Horizon Year 2040 Scenario 1 With Orange Street Extension – Intersection Operations**

Intersection	Jurisdiction	Peak Hour	2040 without Project		2040 SP Scenario One		Change in Delay	Significant?
			DELAY	LOS	DELAY	LOS		
Main Street / Placentia Lane (U)	City of Riverside / City of Colton	AM peak	153.7	F	>200	F	NIA	YES
		PM Peak	>200	F	>200	F	NIA	YES

Draft Program EIR page 3.15-70, Table 3.15-26, Horizon Year 2040 Scenario 2 With Orange Street Extension – Intersection Operations, column heading typographical errors and the error due to traffic model software were corrected as follows (note only the row being updated is included herein due to the size of the table):

**Table 3.15-26. Horizon Year 2040 Scenario 2 With Orange Street Extension – Intersection Operations**

Intersection	Jurisdiction	Peak Hour	2040 Without Project		2040 SP Scenario One		Change in Delay	Significant?
			DELAY	LOS	DELAY	LOS		
Main Street / Placentia Lane (U)	City of Riverside / City of Colton	AM peak	153.7	F	>200	F	NIA	YES
		PM Peak	>200	F	>200	F	NIA	YES

Draft Program EIR page 3.15-75, Table 3.15-28 Summary of Significant Impacts at Study Intersections, row 9 regarding Main St / Placentia Ln (Center Street) was updated as follows (note only the row being updated is included herein due to the size of the table):

Table 3.15-28 Summary of Significant Impacts at Study Intersections

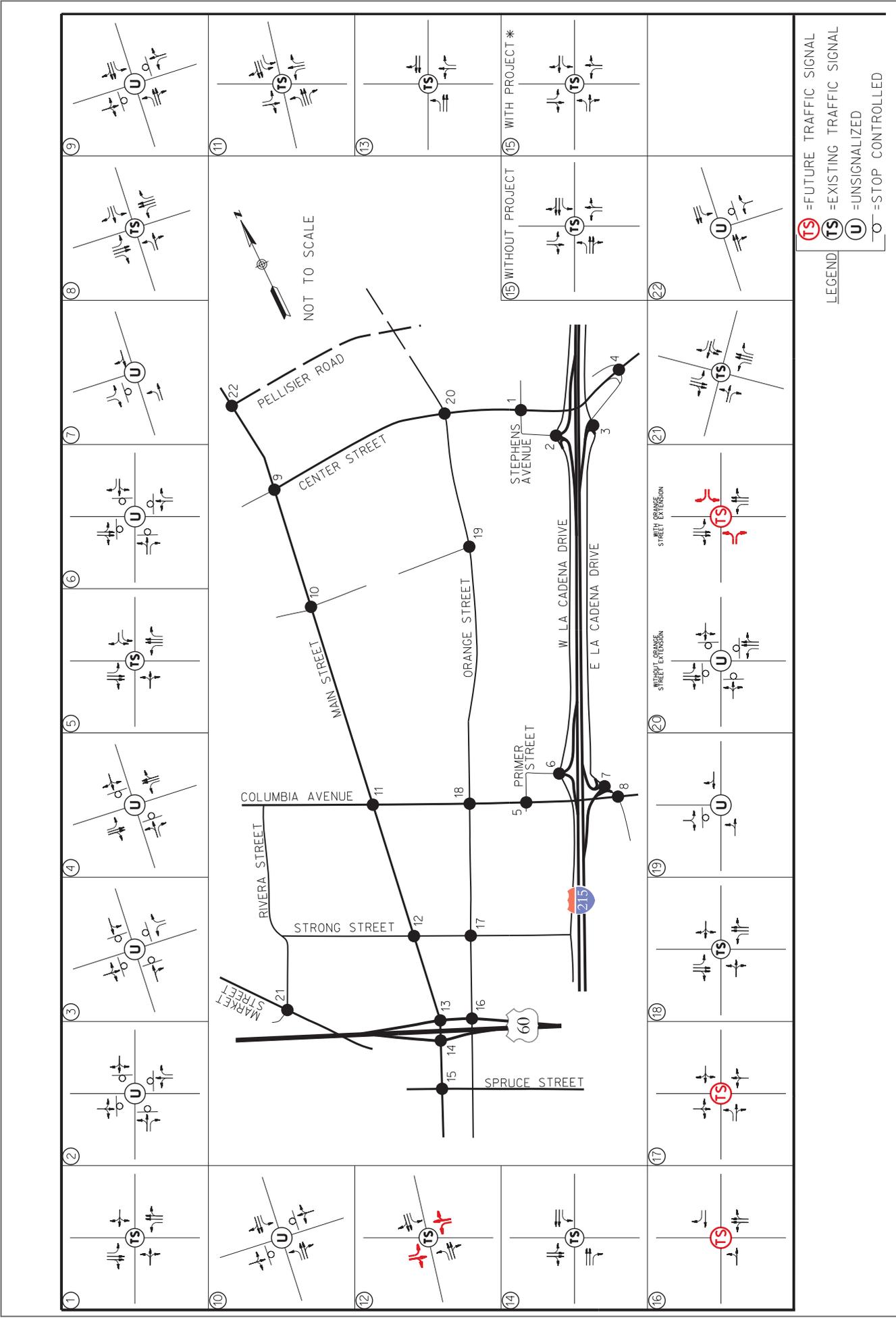
Intersection		Jurisdiction	Scenario Impacted					
			Existing + Project		HY40 SP Scenario 1		HY40 SP Scenario 2	
			Scenario 1 (A)	Scenario 2 (B)	Without Orange (C)	With Orange (D)	Without Orange (E)	With Orange (F)
9.	Main St / Placentia Ln (Center Street)	City of Riverside / City of Colton	√	√	√	√	√	√

In response to City comments, MM-TR-1 through MM-TR-16 in Section 3.15.5, Mitigation Measures, were updated to clarify that improvements were “recommended” in the Traffic Impact Analysis (Appendix H) and to clarify the timing of mitigation. Refer to Table S-3, Summary of Significant Effects and Mitigation Measures, in the Executive Summary updates for the changes to the mitigation measure.

## Section 3.16 – Tribal Cultural Resources

There are no changes to this chapter of the Draft Program EIR.

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**FIGURE 3.15-11**  
**Horizon Year 2040 Baseline Intersection Improvements**  
 Northside Specific Plan Program EIR

SOURCE: Rick Engineering 2020



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## Section 3.17 – Utilities and Service Systems

Two updates were completed in Section 3.17.1, Existing Conditions, as follows:

*(Program Draft EIR Page 3.17-3)*

### ***City of Colton***

There are no existing water lines located within Pellissier Ranch because the site is undeveloped (Figure 3.17-1, Existing Water Infrastructure within Northside SPA). Additionally, there are no existing water lines on industrial properties within Subarea 2. There are existing plans to install a 24-inch water line within La Cadena Drive to serve as a distribution line for the developments within the City of Colton adjacent to the SPA. The City of Colton Water Department provides potable and non-potable water service throughout the City of Colton. The City of Colton's existing potable water system facilities consist of 15 wells, five main booster pumping plants, nine water storage reservoirs, two pressure reducing facilities, and over 120 miles of water transmission and distribution pipelines. The City of Colton acquires 100% of its potable water supply from groundwater in three different basins: the Bunker Hill Basin, the Rialto-Colton Basin, and the Riverside North Basin. City of Colton does not currently import water in order to meet the demands of its service area nor does it currently utilize recycled water or project the use of recycled water in the future.

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*(Program Draft EIR Page 3.17-9)*

### ***City of Colton***

Solid waste collection and disposal within the City of Colton are provided by CR&R, Inc, for residential and commercial land uses. Colton Disposal sorts commercial solid waste at its processing facility where recyclables are separated out and taken for recycling. Solid waste collected within the City of Colton is disposed of at several landfills throughout San Bernardino County and Riverside County. In addition to the landfills mentioned above within Riverside County, the San Timoteo Sanitary Landfill, Mid-Valley Sanitary Landfill, and California Street Landfill are located in San Bernardino County and would also serve the City of Colton portion of the SPA. Table 3.17-4, Existing and Remaining Landfill Capacities – San Bernardino County, shows the existing and remaining capacity of each of these landfills located within San Bernardino County. As shown, all three landfills are currently below their respective estimated total capacities and have a combined remaining capacity of 84,090,182 cubic yards (CalRecycle 2019d, 2019e, 2019f). Combined with the remaining capacity of landfills in the County of Riverside, the total capacity of landfills that would serve the SPA is approximately 330,579,101 cubic yards.

The City of Colton adopted a new ordinance to collect Developer Impact Fees on January 21, 2020, which includes water and wastewater fees. This additional information was added to Section 3.17-2 (Draft EIR page 3.17-16), as follows:

*City of Colton***City of Colton's Municipal Code Chapter 12.32, Developer Impact Fees**

The City of Colton collects DIFs for proposed projects to offset incremental increases in service demand on civic center, fire, library, park police, and transportation facilities. The City of Colton has adopted a local ordinance implementing the provisions of the Quimby Act. The ordinance requires dedication of land, payment of fees in-lieu of parkland dedication, or a combination thereof at a rate of three acres of parkland per 1,000 residents for proposed residential subdivisions. The City also collects parkland fees as part of its Development Impact Fee program to fund the acquisition and/or improvement of parkland. These parkland impact fees are applicable to both residential and non-residential land uses.

In January 2020, the City of Colton adopted Ordinance 02-20 that included updates to established Developer Impact Fees (DIFs) for transportation improvements, civic center facilities, fire stations, police stations, libraries, and parks as well as new DIFs for wastewater and water. Future development within the City of Colton would be subject to pay these DIFs that would go towards improvements to these service areas provided by the City of Colton.

## Section 3.18 – Wildfire

Based on comments provided by the City of Colton, the following addition was made to Section 3.18.2, Relevant Plans, Policies, and Ordinances:

***City of Colton Local Hazard Mitigation Plan***

The LHMP for the City of Colton was adopted on August 6, 2019 (City of Colton 2018). The LHMP summarizes the emergency management cycle of response, recovery, mitigation, and preparedness for the City of Colton. The portion of the SPA that falls within the City of Colton (Subareas 1 and 2) is under the jurisdiction of the City of Colton LHMP.

## Chapter 4 - Cumulative Effects

There are no changes to this chapter of the Draft Program EIR.

## Chapter 5 – Other CEQA Considerations

There are no changes to this chapter of the Draft Program EIR.

## Chapter 6 – Project Alternatives

Based on comments received from the Springbrook Heritage Alliance, Section 6.6.1, Old Spanish Town Village District Alternative Description, was updated to the following:

## 6.6.1 Old Spanish Town Village District Alternative Description

The Old Spanish Town Village District Alternative was developed based on the Notice of Preparation (NOP) comment provided by the Springbrook Heritage Alliance (Appendix A). This alternative was identified by this

group with the intent of increasing cultural and tribal heritage resource preservation and enhancement, preservation of visual resources and community character, increase in community amenities, protection of water resources and reduction of flooding issues, provision of biological enhancement, and reduction of conflicts between land uses. The intent also includes providing a cohesive historical village district. The main “Old Spanish Town Village District” components proposed under this alternative include:

- Old La Placita Historic Park;
- Expanded Trujillo Adobe restoration, museum, and historic use area;
- An expanded Ab Brown Sports Complex;
- Additional Community Space;
- Reuse of the Former Riverside Golf Course as the Springbrook Arroyo Park;
- The provision of a network of walking trails and marked routes connecting the entire Springbrook Arroyo Watershed, Santa Ana River Trail and Parkway, Old Spanish Trail and Agua Mansa, to the top of Pigeon Pass, the peaks of Box Springs Mountains, Blue Mountain, La Loma Hills, and Mt. Rubidoux;
- A bike trail along the Santa Ana River and connections through the area; and
- Restoration of the Springbrook Arroyo.

Under this alternative, the undeveloped area of Pellissier Ranch to the north of Old Pellissier Road would be the Old La Placita Historic Park. The Old La Placita Historic Park area could include uses such as a working 19<sup>th</sup>-century farm, and a historical park planted with various fruit trees typical of the period. It could also include a historical site, as the foundations of La Placita and Pellissier Ranch buildings may be buried underneath the existing topsoil. This alternative would eliminate the development of additional industrial and residential uses in this area. This area is represented on Figure 6-1 as the blue area in the northern area of the Northside Specific Plan and is similar to the location of Subarea 1 area of the SPA.

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Other features to be included in this alternative include the use of small street-car busses with frequent service. Trails are also an important component of this Alternative with decomposed walking trails provided through the proposed parkland system that would connect to adjacent areas. It is also envisioned that any new offices and service shops would be restricted to Main Street and no new mixed-use areas or residential development along Main Street would be provided. Residential development would be restricted to areas already zoned residential, scattered throughout the area north of Orange Street. This alternative also envisions undeveloped Industrial parcels being purchased by small-scale private entrepreneurs and rezoned for Old Spanish Town themed small-scale development, such as a farmers market, community garden, gift and craft shops, neighborhood markets, farm-to-table historical restaurants, sports shops, small offices, or bed and breakfast venues. This alternative also considers the addition of a library near Fremont Elementary School. It is assumed that all other areas of the Northside Specific Plan would remain as identified under the applicable general plan land use designation.

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## Chapter 7 – References

On Program Draft EIR page 7-21, under the Section 3.8: Hazards and Hazardous Materials heading, the following reference was added:

City of Colton. 2018. *City of Colton Local Hazard Mitigation Plan*. Adopted September 2018.  
[https://www.ci.colton.ca.us/DocumentCenter/View/3948/Public-Review-Draft-LHMP\\_Complete?bidId=](https://www.ci.colton.ca.us/DocumentCenter/View/3948/Public-Review-Draft-LHMP_Complete?bidId=)

On Program Draft EIR page 7-26, under the Section 3.11: Noise heading, the following reference was added:

Federal Highway Administration. 2001. *Vibrations Induced by Construction Traffic: A Historic Case Study*.

On Program Draft EIR page 7-32, under the Section 3.15: Transportation heading, the following reference was updated:

City of Colton. 2016. "Mobility Element." In *City of Colton General Plan*. Amended November 2016. Accessed March 17, 2020. <https://www.ci.colton.ca.us/DocumentCenter/View/1348/Mobility-Element-2013?bidId=>.

## Chapter 8 – Certification

There are no changes to this chapter of the Draft Program EIR.

## Appendices

In response to comments received, Appendix C was updated to include the special-status plants with a low potential to occur or not expected to occur information. The updated Appendix C follows this page.

# Appendix C

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Special-Status Plants and Wildlife with a Low Potential to  
Occur or Not Expected to Occur in the SPA

Scientific Name	Common Name	Federal/State/CRPR	WRC MSHCP	Primary Habitat Associations, Life form, Blooming period, Elevation Range)	Potential to Occur
<i>Abronia villosa</i> var. <i>aurifl</i>	chaparral sand-verbena	None/None/1B.1	No	Chaparral, coastal scrub, desert dunes; sandy/annual herb/Jan–Sept/246–5249	Low as there are not many pure sandy soils present in the study area except in the vicinity of the Santa Ana River.
<i>Ambrosia monogyra</i>	singlewhorl burrbrush	None/None/2B.2	No	Chaparral, Sonoran desert scrub; sandy/perennial shrub/Aug–Nov/633–1640	Low as there are only two records (1926 and 1947) from region.
<i>Ambrosia pumila</i>	San Diego ambrosia	FE/None/1B.1	Yes	Chaparral, coastal scrub, valley and foothill grassland, vernal pools; sandy loam or clay, often in disturbed areas, sometimes alkaline/perennial rhizomatous herb/Apr–Oct/66–1362. Typically found on open floodplain terraces or in the margins of vernal pools. The extant Riverside County localities are found on Garrelson gravelly fine sandy loams when in association with floodplains, and on Las Posas loam in close proximity to silty, alkaline soils of the Willows series at Skunk Hollow.	Low potential primarily within the Santa Ana River portion of the study area. Only three records in Riverside County and none in study area region. In addition, study area not known to support vernal pools nor the soils types where this species has been recorded.
<i>Astragalus hornii</i> var. <i>hornii</i>	Hom's milk-veitch	None/None/1B.1	No	Meadows and seeps; playas; lake margins, alkaline/annual herb/May–Oct/197–2789	Not expected to occur as the single historical record from the region is extirpated (CNDDDB 2017).
<i>Barberris nevillii</i>	Nevins' barberry	FE/CE/1B.1	Yes	Chaparral, cismontane woodland, coastal scrub, riparian scrub; sandy or gravelly/perennial evergreen shrub/Mar–June/230–2707	Not expected as no occurrences are recorded near the study area and there is very limited suitable habitat present.
<i>Brodiaea filifolia</i>	thread-leaved brodiaea	FT/CE/1B.1	Yes	Chaparral (openings), cismontane woodland, coastal scrub, playas, valley and foothill grassland, vernal pools; often clay/perennial bulbiferous herb/Mar–June/62–3675	Low as no occurrences recorded near the study area and there is very limited suitable habitat present.
<i>California macrophylla</i>	round-leaved filaree	None/None/1B.2	Yes	Cismontane woodland, valley and foothill grassland; clay/annual herb/Mar–May/49–3937	Low as there is very limited suitable clay soils present in study area.
<i>Calochortus palmeri</i> var. <i>palmeri</i>	Palmer's mariposa lily	None/None/1B.2	No	Chaparral, lower montane coniferous forest, meadows and seeps; mesic/perennial bulbiferous herb/Apr–July/2329–7841	Not expected to occur. The site is outside of the species' known elevation range.
<i>Calochortus plummerae</i>	Plummer's mariposa lily	None/None/4.2	Yes	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland; granitic, rocky/perennial bulbiferous herb/May–July/328–8577	Moderate potential to occur in the coastal scrub that occurs in the northern part of the study area.
<i>Carex comosa</i>	bristly sedge	None/None/2B.1	No	Coastal prairie, marshes and swamps (lake margins), valley and foothill grassland/perennial rhizomatous herb/May–Sept/0–2051	Not expected to occur as single record from the region is from 1882 and is likely extirpated.
<i>Castilleja lasiorhyncha</i>	San Bernardino Mountains owl's clo	None/None/1B.2	No	Chaparral, meadows and seeps, pebble plain, riparian woodland, upper montane coniferous forest; mesic/annual herb (hemiparasitic)/May–Aug/4265–7841	Not expected to occur. The site is outside of the species' known elevation range.
<i>Centromadia pungens</i> ssp. <i>laevis</i>	smooth tarplant	None/None/1B.1	Yes	Chenopod scrub, meadows and seeps; playas; riparian woodland, valley and foothill grassland; alkaline/annual herb/Apr–Sept/0–2100	Moderate potential in some of the undeveloped portions of the study area.
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	salt marsh bird's-beak	FE/CE/1B.2	No	Coastal dunes, marshes and swamps (coastal salt)/annual herb (hemiparasitic)/May–Oct/0–98	Not expected to occur as historical record in region extirpated.

<i>Chorizanthe parryi</i> var. <i>parryi</i>	Parry's spinneflower	None/None/1B.1	Yes	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland; sandy or rocky, openings/annual herb/Apr–June/902–4003	Moderate potential in some of the undeveloped portions of the study area.
<i>Chorizanthe xanti</i> var. <i>leucotheca</i>	white-bracted spinneflower	None/None/1B.2	No	Coastal scrub (alluvial fans), Mojavean desert scrub, piñon and juniper woodland; sandy or gravelly/annual herb/Apr–June/984–3937	Low as limited suitable habitat present in study area and only within the Santa Ana River where alluvial terraces may be present.
<i>Climopodium chandleri</i>	San Miguel savory	None/None/1B.2	Yes	Occurs in rocky, gabbroic or metavolcanic soils. Habitats include chaparral, cismontane woodland, coastal scrub, riparian woodland, and valley and foothill grassland.	Low in undeveloped portions of the study area due to disturbed conditions, very limited suitable soils only in northern portion of study area, and that no records occur in the vicinity of the study area region.
<i>Cuscuta obtusiflora</i> var. <i>glandulosa</i>	Peruvian dodder	None/None/2B.2	No	Marshes and swamps (freshwater)/annual vine (parasitic)/July–Oct/49–919	Not expected as only record (dated 1890) from region near Warm Springs is extirpated.
<i>Cylindropuntia californica</i> var. <i>californica</i>	snake cholla	None/None/1B.1	No	Chaparral, coastal scrub/perennial stem succulent/Apr–May/98–492	Low as limited suitable habitat present in study area and only within the northern portion where coastal scrub is present.
<i>Dodecahema leptoceras</i>	slender-horned spinneflower	FE/CE/1B.1	Yes	Chaparral, cismontane woodland, coastal scrub (alluvial fan); sandy/annual herb/Apr–June/656–2493	Low as limited suitable habitat present in study area and only within the Santa Ana River where alluvial terraces may be present.
<i>Eriastrum densifolium</i> ssp. <i>sanctorum</i>	Santa Ana River woollystar	FE/CE/1B.1	Yes	Chaparral, coastal scrub (alluvial fan); sandy or gravelly/perennial herb/Apr–Sep/299–2001	Low as limited suitable habitat present in study area and only within the Santa Ana River where alluvial terraces may be present.
<i>Fimbristylis thermalis</i>	hot springs fimbriistylis	None/None/2B.2	No	Meadows and seeps (alkaline, near hot springs)/perennial rhizomatous herb/July–Sep/361–4396	Not expected as hot springs are not present within study area.
<i>Galium californicum</i> ssp. <i>primum</i>	Alvin Meadow bedstraw	None/None/1B.2	Yes	Chaparral, lower montane coniferous forest; granitic, sandy/perennial herb/May–July/4429–5577	Not expected to occur. The site is outside of the species' known elevation range.
<i>Helianthus nuttallii</i> ssp. <i>parishii</i>	Los Angeles sunflower	None/None/1A	No	Marshes and swamps (coastal salt and freshwater)/perennial rhizomatous herb/Aug–Oct/33–5495	Not expected as this species is presumed extirpated or extinct because they have not been seen or collected in the wild in California for many years.
<i>Horkelia cuneata</i> var. <i>puberula</i>	mesa horkelia	None/None/1B.1	No	Chaparral (maritime), cismontane woodland, coastal scrub; sandy or gravelly/perennial herb/Feb–July (Sep)/230–2657	Low potential as many historical occurrences extirpated, and habitat only in benches of Santa Ana River.
<i>Imperata brevifolia</i>	California satintail	None/None/2B.1	No	Chaparral, coastal scrub, Mojavean desert scrub, meadows and seeps (often alkali), riparian scrub; mesic/perennial rhizomatous herb/Sep–May/0–3986	Low potential to occur as there is only one historical record (1891) and one current record (2010) from the region.
<i>Ivesia argyrocoma</i> var. <i>argyrocoma</i>	silver-haired Ivesia	None/None/1B.2	No	Meadows and seeps (alkaline), pebble plain, upper montane coniferous forest/perennial herb/June–Aug/4800–9711	Not expected to occur. The site is outside of the species' known elevation range.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Coulter's goldfields	None/None/1B.1	No	Marshes and swamps (coastal salt), plays, vernal pools/annual herb/Feb–June/3–4003	Low as there is very limited suitable vernal mesic areas present in study area.
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's pepper-grass	None/None/4.3	No	Chaparral, coastal scrub/annual herb/Jan–July/3–2904	Moderate potential to occur in the coastal scrub that occurs in the northern part of the study area.
<i>Lilium parryi</i>	lemon lily	None/None/1B.2	Yes	Lower montane coniferous forest, meadows and seeps, riparian forest, upper montane coniferous forest; mesic/perennial bulbiferous herb/July–Aug/4003–9006	Not expected to occur. The site is outside of the species' known elevation range.
<i>Lycaium parishii</i>	Parish's desert-thorn	None/None/2B.3	No	Coastal scrub, Sonoran desert scrub/perennial shrub/Mar–Apr/443–3281	Not expected to occur as single record from San Bernardino Valley from 1885 is extirpated.

<i>Malacothammus parishii</i>	Parish's bush-mallow	None/None/1A	No	Chaparral, coastal scrub/perennial deciduous shrub/June–July/1001–1493	Not expected as this species is presumed extirpated or extinct because they have not been seen or collected in the wild in California for many years.
<i>Monardella macrantha</i> ssp. <i>hallii</i>	Hall's monardella	None/None/1B.3	Yes	Broadleaved upland forest, chaparral, cismontane woodland, lower montane coniferous forest, valley and foothill grassland/perennial rhizomatous herb/June–Oct/2395–7201	Not expected to occur. The site is outside of the species' known elevation range.
<i>Monardella pringlei</i>	Pringle's monardella	None/None/1A	No	Coastal scrub (sandy)/annual herb/May–June/984–1312	Not expected as this species is presumed extirpated or extinct because they have not been seen or collected in the wild in California for many years.
<i>Myosurus minimus</i> ssp. <i>apus</i>	little mouse-tail	None/None/3.1	Yes	Valley and foothill grassland, vernal pools (alkaline)/annual herb/Mar–June/66–2100	Low as there is very limited suitable vernal mesic areas present in study area.
<i>Nasturtium gambelii</i>	Gambel's water cress	FE/CT/1B.1	No	Marshes and swamps (freshwater or brackish)/perennial rhizomatous herb/Apr–Oct/16–1083	Not expected to occur as single record from Urbila Hot Springs in San Bernardino Valley from 1910 is extirpated.
<i>Opuntia basilaris</i> var. <i>brachyclada</i>	short-joint beavertail	None/None/1B.2	No	Chaparral, Joshua tree woodland, Mojavean desert scrub, piñon and juniper woodland/perennial stem succulent/Apr–June (Aug)/1394–5906	Not expected to occur. The site is outside of the species' known elevation range.
<i>Perideridia parishii</i> ssp. <i>parishii</i>	Parish's yampah	None/None/2B.2	No	Lower montane coniferous forest, meadows and seeps, upper montane coniferous forest/perennial herb/June–Aug/4806–9843	Not expected to occur. The site is outside of the species' known elevation range.
<i>Phacelia stellaris</i>	Brandt's star phacelia	None/None/1B.1	Yes	Coastal dunes, coastal scrub/annual herb/Mar–June/3–1312. This species typically occurs in sandy openings, sandy benches, dunes, sandy washes, or flood plains of rivers. Within Riverside County, it is found within sandy washes and/or benches in alluvial flood plains.	Low potential primarily in the Santa Ana River portion of the study area.
<i>Ribes divaricalum</i> var. <i>parishii</i>	Parish's gooseberry	None/None/1A	No	Riparian woodland/perennial deciduous shrub/Feb–Apr/213–984	Not expected as this species is presumed extirpated or extinct because they have not been seen or collected in the wild in California for many years.
<i>Schoenus nigricans</i>	black bog-rush	None/None/2B.2	No	Marshes and swamps (often alkaline)/perennial herb/Aug–Sept/492–6562	Low potential in mesic habitat of the Santa Ana River.
<i>Senecio aphanactis</i>	chaparral ragwort	None/None/2B.2	No	Chaparral, cismontane woodland, coastal scrub; sometimes alkaline/annual herb/Jan–Apr/49–2625	Low as limited suitable habitat present in study area and only within the northern portion where coastal scrub is present.
<i>Sidalcea malviflora</i> ssp. <i>dolosa</i>	Bear Valley checkerbloom	None/None/1B.2	No	Lower montane coniferous forest (meadows and seeps), meadows and seeps, riparian woodland, upper montane coniferous forest (meadows and seeps)/perennial herb/May–Aug/4905–8809	Not expected to occur. The site is outside of the species' known elevation range.
<i>Sidalcea neomexicana</i>	salt spring checkerbloom	None/None/2B.2	No	Chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, playas; alkaline, mesic/perennial herb/Mar–June/49–5020	Not expected as there is only two historical records from circa 1917 in study area region.
<i>Sphenopholis obtusata</i>	prairie wedge grass	None/None/2B.2	No	Cismontane woodland, meadows and seeps; mesic/perennial herb/Apr–July/984–6562	Not expected as there is only one historical record (dated 1917) mapped in the Santa Ana River bottoms.
<i>Streptanthus campestris</i>	southern jewelflower	None/None/1B.3	No	Chaparral, lower montane coniferous forest, piñon and juniper woodland; rocky/perennial herb/(Apr) May–July/2953–7546	Not expected to occur. The site is outside of the species' known elevation range.

Symphyotichum defoliatum	San Bernardino aster	None/None/1B.2	No	Cismontane woodland, coastal scrub, lower montane coniferous forest, meadows and seeps, marshes and swamps, valley and foothill grassland (vernally mesic); near ditches, streams, springs/perennial rhizomatous herb./July–Nov/7–6693	Low potential as there are limited vernal mesic areas present in the study area and most records are from early 1900's. However, the Santa Ana River may provide suitable habitat.
Thelypteris puberula var. sonorensis	Sonoran maiden fern	None/None/2B.2	No	Meadows and seeps (seeps and streams)/perennial rhizomatous herb./Jan–Sep/164–2001	Low potential for study area only within the Santa Ana River.

**Valley Region  
Documented Special-Status Wildlife Species**

Common Name	Scientific Name	Federal Status	State Status	WRC MSHCP Species?	Habitat	PTO
Amphibians California red-legged frog	<i>Rana draytonii</i>	FT	SSC	Yes	Lowland streams, wetlands, riparian woodlands, livestock ponds; dense, shrubby or emergent vegetation associated with deep, still or slow-moving water; uses adjacent uplands	Not expected to occur. The Northside Specific Plan Area (SPA) lacks aquatic habitat required by this species. This species is also not expected to occur immediately west of the SPA in the Santa Ana River. The only extant population of this species in Riverside County is limited to the Whitewater Preserve in Whitewater Canyon, approximately 40 miles east of the SPA (Nafis 2019; CDFW 2019).
mountain yellow-legged frog	<i>Rana muscosa</i>	FE	SE	Yes	Lakes, ponds, meadow streams; isolated pools, and open riverbanks; rocky canyons in narrow canyons and in chaparral	Not expected to occur. The SPA lacks aquatic habitat required by this species. This species is also not expected to occur immediately west of the SPA in the Santa Ana River. The known geographical range for this species in southern California is isolated to rocky streams of Palomar Mountain and the San Gabriel, San Bernardino, and San Jacinto Mountains (Nafis 2016).
Western spadefoot	<i>Spea hammondi</i>	None	SSC	Yes	Primarily grassland and vernal pools, but also in ephemeral wetlands that persist at least 3 weeks in chaparral, coastal scrub, valley-foothill woodlands, pastures, and other agriculture	Low potential to occur. This species is not expected to breed within the SPA due to the lack of vernal pools or ephemeral wetlands. The SPA is largely developed, and no ponding was observed on historical aerial photography (Google 2019). In addition, soils in undeveloped portions of the SPA are moderately well-drained to somewhat excessively drained (USDA NRCS 2019) and would not be expected to support vernal pools or ephemeral wetlands. However, there is marginal habitat for the species immediately west of the SPA in the Santa Ana River and the northern portion of the SPA could provide suitable upland habitat for this species. The closest known occurrence is approximately 1.2 miles east (CDFW 2019).
Reptiles San Diegoan tiger whiptail	<i>Aspidoscelis tigris stejnegeri</i>	None	SSC	Yes	Hot and dry areas with sparse foliage, including chaparral, woodland, and riparian areas.	Moderate potential to occur. This species could occur in open areas of upland mustard and brittle bush scrub located in the northern portion of the SPA. This species also has a moderate potential to occur in upland areas of the Santa Ana River, immediately west of the SPA.
southern rubber boa	<i>Charina umbratica</i>	None	ST	Yes	Montane oak-conifer and mixed-conifer forests, montane chaparral, wet meadows; usually in vicinity of streams or wet meadows	Not expected to occur. The SPA lacks suitable habitat for this species. This species is also not expected to occur immediately west of the SPA in the Santa Ana River due to a lack of suitable habitat.

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Common Name	Scientific Name	Federal Status	State Status	WRC MSHCP Species?	Habitat	PTO
San Diego banded gecko	<i>Coleonyx variegatus abbotti</i>	None	SSC	Yes	Rocky areas within coastal scrub and chaparral	High potential to occur. This species could occur in rocky areas within brittle bush scrub located along the northern extent of the SPA. The closest known occurrence is located approximately 750 feet northeast (CDFW 2019). This species is not expected to occur immediately west of the SPA in the Santa Ana River due to a lack of suitable habitat.
coast patch-nosed snake	<i>Salvadora hexalepis virgulea</i>	None	SSC	No	Bushy or shrubby vegetation; requires small mammal burrows for refuge and overwintering sites	Moderate potential to occur. This species could occur within brittle bush scrub located in the northern portion of the SPA. This species also has a moderate potential to occur in upland areas of the Santa Ana River, immediately west of the SPA.
two-striped gartersnake	<i>Thamnophis hammondi</i>	None	SSC	No	Streams, creeks, pools, streams with rocky beds, ponds, lakes, vernal pools	Not expected to occur. The SPA lacks aquatic habitat required by this species. This species has a low potential to occur immediately west of the SPA in the Santa Ana River. Known occurrences in the southern California are isolated to mountain ranges and foothills (CDFW 2019). The closest known occurrence is located within the foothills of the San Bernardino Mountains, approximately 12 miles northeast (CDFW 2019).
California glossy snake	<i>Arizona elegans occidentalis</i>	None	SSC	No	Commonly inhabits arid scrub, rocky washes, grasslands, and chaparral within desert regions throughout southern California. Prefers open sandy areas with scattered brush. Also found in rocky areas.	Moderate potential to occur. This species could occur within undeveloped areas located in the northern portion of the SPA. This species also has a moderate potential to occur in upland areas of the Santa Ana River, immediately west of the SPA.
southern California legless lizard	<i>Anniella stebbinsi</i>	None	SSC	No	Coastal dunes, stabilized dunes, beaches, dry washes, valley-foothill, chaparral, and scrubs; pine, oak, and riparian woodlands; associated with sparse vegetation and moist sandy or loose, loamy soils	High potential to occur. This species could occur within undeveloped areas located in the northern portion of the SPA. Multiple occurrences recorded recently in the surrounding vicinity indicate that this species is likely to occur in microhabitat where loose, moist substrate is present. The closest known occurrence is located approximately 0.2-mile northwest, across the Santa Ana River (CDFW 2019). This species also has a high potential to occur immediately west of the SPA in the Santa Ana River.
red diamond rattlesnake	<i>Crotalus ruber</i>	None	SSC	Yes	Inhabits rocky areas within coastal scrub, chaparral, oak and pine woodlands, grasslands, cultivated areas, and desert flats.	Moderate potential to occur. This species could occur in rocky areas within brittle bush scrub located along the northern extent of the SPA.
Blainville's horned lizard	<i>Phrynosoma blainvillii</i>	None	SSC	Yes	Open areas of sandy soil in valleys, foothills and semi-arid mountains including coastal scrub, chaparral, valley-foothill hardwood, conifer, riparian, pine-eypress, juniper and annual grassland.	Low potential to occur. The SPA lacks open areas with loose, sandy soils. This species has a moderate potential to occur immediately west of the SPA in the Santa Ana River.

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western pond turtle	<i>Actinemys marmorata</i> (= <i>Emys marmorata pallida</i> )	None	SSC	Yes	Slow-moving permanent or intermittent streams, ponds, small lakes, reservoirs with emergent basking sites; adjacent uplands used for nesting and during winter. There are several occurrences on the westernmost edge of San Bernardino County (CNDDB 2015).	Not expected to occur. The SPA lacks aquatic habitat required by this species. This species has a low potential to occur within slow-moving pools, if present, immediately west of the SPA in the Santa Ana River.
<b>Birds</b>						
yellow rail	<i>Coturnicops noveboracensis</i>	None	SSC	No	Nesting requires wet marsh/sedge meadows or coastal marshes with wet soil and shallow, standing water	Not expected to occur. The SPA lacks suitable habitat for this species. This species is also not expected to occur immediately west of the SPA in the Santa Ana River due to a lack of suitable habitat.
bald eagle	<i>Haliaeetus leucocephalus</i> (nesting & wintering)	FDL	SE, FP	Yes	Nests in forested areas adjacent to large bodies of water, including seacoasts, rivers, swamps, large lakes; winters near large bodies of water in lowlands and mountains	Not expected to nest or forage. The SPA and surrounding vicinity lacks large bodies of water with adjacent forested areas to provide suitable nesting or foraging habitat for this species. This species may occasionally fly over the SPA.
California black rail	<i>Laterallus jamaicensis coturniculus</i>	None	SI, FP	No	Tidal marshes, shallow freshwater margins, wet meadows, and flooded grassy vegetation; suitable habitats are often supplied by canal leakage in Sierra Nevada foothill populations	Not expected to occur. The SPA lacks suitable habitat for this species. This species is also not expected to occur immediately west of the SPA in the Santa Ana River due to a lack of suitable habitat.
burrowing owl	<i>Athene cunicularia</i> (burrow sites & some wintering sites)	None	SSC	Yes	Nests and forages in grassland, open scrub, and agriculture, particularly with ground squirrel burrows.	Moderate potential to occur. Suitable habitat for this species is present within non-native grassland, upland mustards, and brittle bush scrub located throughout the SPA. In addition, the closest known occurrence is located approximately 1.5 miles northwest, where multiple breeding pairs were observed (CDFW 2019). Areas with potentially suitable habitat for burrowing owl have been identified in Riverside County's Multiple Species Habitat Conservation Plan (MSHCP) as Burrowing Owl Survey Areas. As such, protocol presence-absence surveys would be required within these designated areas within the Riverside County portion of the SPA. Protocol surveys for this species should be conducted in the San Bernardino County portion of the SPA where suitable habitat is also present. This species also has a moderate potential to occur within upland areas of the Santa Ana River, immediately west of the SPA.
loggerhead shrike	<i>Lanius ludovicianus</i> (nesting)	None	SSC	Yes	Nests and forages in open habitats with scattered shrubs, trees, or other perches	Moderate potential to occur. This species may occur where there are open disturbed lands (foraging) with some shrubby areas (nesting). This species also has a moderate potential to occur within upland areas of the Santa Ana River, immediately west of the SPA.

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Swainson's hawk	<i>Buteo swainsoni</i> (nesting)	None	ST	Yes	Nests in open woodland and savanna, riparian and in isolated large trees; forages in nearby grasslands and agricultural areas such as wheat and alfalfa fields, and pasture. This species occasionally stops over during migration, but is not known to currently nest in San Bernardino or Riverside counties.	Not expected to nest. This species may occasionally fly over during migration, but is not known to currently nest in San Bernardino or Riverside counties.
tricolored blackbird	<i>Agelaius tricolor</i> (nesting colony)	None	ST, SSC	Yes	Habitat requirements for a breeding colony include open water, appropriate nesting substrate, and nearby foraging habitat. Nests tend to occur in emergent wetland areas with cattail and bulrush, but they also nest in bull thistle, mustard, nettle, cheeseweed meadow, and Himalayan blackberry. Foraging habitat includes grasslands, open fields, agricultural areas, or adjacent woodland edges. Alfalfa fields are documented as the primary foraging area for several colonies in Riverside County. Sunflower is the only other crop known to support good foraging opportunities.	Not expected to occur. The SPA does not support emergent wetlands or inundated agricultural fields suitable for nesting. A historical breeding record occurs within Evans Lake from 1951, approximately 1,400 feet southwest of the SPA (CDFW 2019). However, this breeding colony has not been observed during follow-up visits (CDFW 2019). The area surrounding this historical occurrence is now largely developed. Therefore, this species is not likely to re-colonize Evans Lake or use the SPA as foraging habitat. This species is also not expected to occur immediately west of the SPA in the Santa Ana River due to the lack of large swathes of emergent wetlands.
yellow warbler	<i>Setophaga petechia</i> (nesting)	None	SSC	Yes	Nests and forages in riparian and oak woodlands; montane chaparral, open ponderosa pine and mixed conifer habitats	Not expected to nest. The SPA lacks riparian vegetation suitable for nesting; however, this species may use the non-native woodland and broad-leaved upland forest mapped within the SPA as foraging habitat. This species has a moderate potential to nest in riparian vegetation immediately west of the SPA in the Santa Ana River.
coastal California gnatcatcher	<i>Polioptila californica californica</i>	FT	SSC	Yes	Nests and forages in various sage scrub communities, often dominated by California sagebrush and buckwheat; generally avoids nesting in areas with a slope of greater than 40% majority of nesting at less than 1,000 ft in elevation	Moderate potential to occur. Suitable habitat is present within brittle bush scrub located along the northern boundary of the SPA. Additionally, USFWS-designated critical habitat for this species is mapped within the northern portion of the SPA. The closest extant occurrence is located approximately 2.6 miles northwest. This species is not expected to occur immediately west of the SPA in the Santa Ana River due to a lack of suitable habitat.
least Bell's vireo	<i>Vireo bellii pusillus</i> (nesting)	FE	SE	Yes	Nests and forages in low, dense riparian thickets, along water or along dry parts of intermittent streams; forages in riparian and adjacent shrubland late in nesting season	Not expected to nest. The SPA lacks riparian vegetation suitable for nesting. This species has a high potential to nest in riparian vegetation immediately west of the SPA in the Santa Ana River. Several breeding pairs have been documented immediately west of the SPA in the Santa Ana River.

**Valley Region  
Documented Special-Status Wildlife Species**

Common Name	Scientific Name	Federal Status	State Status	WRC MSHCP Species?	Habitat	PTO
southwestern willow flycatcher	<i>Empidonax traillii eximius</i> (nesting)	FE	SE	Yes	Nests in dense riparian habitats along streams, reservoirs, or wetlands; uses variety of riparian and shrubland habitats during migration	Not expected to nest. The SPA lacks riparian vegetation suitable for nesting. This species has a low potential to nest immediately west of the SPA in the Santa Ana River, which is USFWS-designated critical habitat for the species; however, this portion of the Santa Ana River lacks dense, continuous riparian habitat with slow-moving water typically preferred by this species as nesting habitat. This species may use riparian vegetation in the Santa Ana River as stopover habitat during migration.
yellow-breasted chat	<i>Icteria virens</i> (nesting)	None	SSC	Yes	Nests and forages in dense, relatively wide riparian woodlands and thickets of willows, vine tangles and dense brush	Not expected to nest. The SPA lacks riparian vegetation suitable for nesting. This species has a moderate potential to nest in riparian vegetation immediately west of the SPA in the Santa Ana River.
western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i> (nesting)	FT	SE	Yes	Nests in dense, wide riparian woodlands and forest with well-developed understories. Only known from Prado Basin in the valley region of San Bernardino County.	Not expected to nest. The current breeding range for this species in California is isolated to the Kern River, Colorado River, and in Sacramento Valley (Hughes 2015).
<b>Fishes</b>						
southern steelhead - southern California DPS	<i>Oncorhynchus mykiss tshawytscha</i> pop. 10	FE	None	No	Clean, clear, cool, well-oxygenated streams; needs relatively deep pools in migration and gravelly substrate to spawn	Not expected to occur. The SPA lacks aquatic habitat for this species. This species is known to occur immediately west of the SPA in the Santa Ana River (CDFW 2019).
Santa Ana speckled dace	<i>Rhinichthys osculus</i> ssp. 3	None	SSC	No	Headwaters of the Santa Ana and San Gabriel Rivers; may be extirpated from the Los Angeles River system	Not expected to occur. The SPA lacks aquatic habitat for this species. This species is not expected to occur immediately west of the SPA in the Santa Ana River. The closest known occurrences for this species are located at the headwaters of the Santa Ana River, approximately 12 miles northeast of the SPA (CDFW 2019).
arroyo chub	<i>Gila arcuifili</i>	None	SSC	Yes	Warm, fluctuating streams with slow-moving or backwater sections of warm to cool streams at depths >40 centimeters (16 inches); substrates of sand or mud	Not expected to occur. The SPA lacks aquatic habitat for this species. This species is known to occur immediately west of the SPA in the Santa Ana River (CDFW 2019).
Santa Ana sucker	<i>Catostomus santaanae</i>	FT	None	Yes	Small, shallow, cool, clear streams less than 7 meters (23 feet) in width and a few centimeters to more than a meter (1.5 inches to more than 3 feet) in depth; substrates are generally coarse gravel, rubble, and boulder	Not expected to occur. The SPA lacks aquatic habitat for this species. This species is known to occur immediately west of the SPA in the Santa Ana River, which is USFWS-designated critical habitat for the species (CDFW 2019).
<b>Mammals</b>						
San Bernardino flying squirrel	<i>Glaucomys oregonensis californicus</i>	None	SSC	Yes	Coniferous and deciduous forests, including riparian forests	Not expected to occur. This species is isolated to forests of the San Gabriel, San Bernardino, and San Jacinto Mountains (Brylski et al. 1998).

**Valley Region  
Documented Special-Status Wildlife Species**

Common Name	Scientific Name	Federal Status	State Status	WRC MSHCP Species?	Habitat	PTO
white-eared pocket mouse	<i>Perognathus allicolus allicolus</i>	None	SSC	No	Arid ponderosa pine communities	Not expected to occur. The SPA lacks suitable habitat for this species. This species is also not expected to occur immediately west of the SPA in the Santa Ana River due to a lack of suitable habitat.
San Diego desert woodrat	<i>Neotoma lepida inermidia</i>	None	SSC	Yes	Coastal scrub, desert scrub, chaparral, cacti, rocky areas	Moderate potential to occur. This species could occur within brittle bush scrub located in the northern portion of the SPA. This species also has a moderate potential to occur within upland areas of the Santa Ana River, immediately west of the SPA.
pallid bat	<i>Antrozous pallidus</i>	None	SSC	No	Found throughout and lands of southwestern North America. Pallid bats roost in a variety of structures, including crevices of rocks, caves, mines, cavities of trees, and human-made structures, but most records of roosts of pallid bats identify geologic features as the predominant roosting structure.	Moderate potential to occur. Although the SPA lacks geologic features typically used as roosting sites, this species may roost in bridges or vacant buildings within the SPA. This species would forage in grasslands, shrublands, and woodlands within the SPA and adjacent Santa Ana River, if roosts are present nearby.
American badger	<i>Taxidea taxus</i>	None	SSC	No	Dry, open, treeless areas; grasslands; coastal scrub, agriculture, pastures, especially with friable soils	Low potential to occur. The SPA contains marginally suitable habitat; however, undeveloped areas within the SPA and adjacent Santa Ana River are fragmented by urban development and disturbed by human activity, which limits the potential for the species.
Los Angeles pocket mouse	<i>Perognathus longimembris brevinasus</i>	None	SSC	Yes	Lower elevation grassland, alluvial sage scrub, and coastal scrub	Low potential to occur. The SPA lacks suitable scrub habitat with friable sand, and undeveloped areas located in the northern portion of the SPA are typically disturbed and fragmented by urban development to support this species. However, the SPA is located adjacent to the Santa Ana River, which contains sparse scrub habitat with friable sandy soils that could provide suitable habitat. In addition, the Santa Ana River occurs within a Riverside County MSHCP Mammal Species Survey Area designated for this species.
pallid San Diego pocket mouse	<i>Chaetodipus fallax pallidus</i>	None	SSC	No	Desert wash, desert scrub, desert succulent scrub, and piñon-juniper woodland	Moderate potential to occur. This species may occur within brittle bush scrub located in the northern portion of the SPA. This species also has a moderate potential to occur within upland areas of the Santa Ana River, immediately west of the SPA. The closest known occurrence is located approximately 13 miles north of the SPA (GDFW 2019).

**Valley Region  
Documented Special-Status Wildlife Species**

Common Name	Scientific Name	Federal Status	State Status	WRC MSHCP Species?	Habitat	PTO
northwestern San Diego pocket mouse	<i>Chaetodipus fallax fallax</i>	None	SSC	Yes	Coastal scrub, mixed chaparral, sagebrush, desert wash, desert scrub, desert succulent shrub, piñon-juniper, and annual grassland	Moderate potential to occur. This species may occur within brittle bush scrub located in the northern portion of the SPA. This species also has a moderate potential to occur within upland areas of the Santa Ana River, immediately west of the SPA. The closest known occurrence is located approximately 3.2 miles south of the SPA (GDFW 2019).
pocketed free-tailed bat	<i>Nyctinomops femorosaccus</i>	None	SSC	No	Pinon-juniper woodlands, desert scrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, palm oases; roosts in high cliffs or rock outcrops with dropoffs, caverns, buildings	Moderate potential to occur. Although the SPA lacks geologic features typically used as roosting sites, this species may roost in vacant buildings within the SPA and surrounding region. This species has a moderate potential to forage in undeveloped areas within the northern portion of the SPA as well as over riparian vegetation immediately west of the SPA in the Santa Ana River.
San Bernardino kangaroo rat	<i>Dipodomys merriami parvus</i>	FE	SSC	Yes	Sparse scrub habitat, alluvial scrub/coastal scrub habitats on gravelly and sandy soils near river and stream terraces	Low potential to occur. The SPA lacks suitable alluvial scrub habitat, and undeveloped areas located in the northern portion of the SPA are typically disturbed and fragmented to support this species. However, the SPA is located adjacent to the Santa Ana River, which contains alluvial scrub habitat with friable gravelly or sandy soils that could provide suitable habitat. In addition, the Santa Ana River occurs within a Riverside County MSHCP Mammal Species Survey Area designated for this species.
San Diego black-tailed Jackrabbit	<i>Lepus californicus bennettii</i>	None	SSC	Yes	Arid habitats with open ground; grasslands, coastal scrub, agriculture, disturbed areas, and rangelands	Moderate potential to occur. This species may occur within undeveloped areas located in the northern portion of the SPA. This species also has a moderate potential to occur within upland areas of the Santa Ana River, immediately west of the SPA.
southern grasshopper mouse	<i>Onychomys torridus ramona</i>	None	SSC	No	Grassland and sparse coastal scrub. Their diet consists mostly of arthropods, such as beetles, grasshoppers and scorpions, as well as other mammal species, such as the little pocket mouse and the western harvest mouse. For these reasons, trapping studies are not set-up to capture these species and very little is known about their current distribution.	Low potential to occur. The SPA contains suitable habitat for this species; however, this species is uncommon in the region, and no recent records occur within the vicinity of Riverside or San Bernardino (Brylski et al. 1998).

**Valley Region  
Documented Special-Status Wildlife Species**

Common Name	Scientific Name	Federal Status	State Status	WRC MSHCP Species?	Habitat	PTO
Stephens' Kangaroo rat	<i>Dipodomys stephensi</i>	FE	ST	Yes	Annual and perennial grassland habitats, coastal scrub or sagebrush with sparse canopy cover or in disturbed areas. Only occurs in low abundance at the very southwestern edge of San Bernardino County.	Low potential to occur. The SPA lacks grassland-scrub transitional areas suitable for this species. Additionally, the grassland habitat present within the SPA are highly fragmented or too mechanically perturbed to provide suitable habitat for this species. The closest known occurrence is located approximately 3 miles southeast (CDFW 2019). Not expected to occur in the Santa Ana River immediately west of the SPA due to lack of suitable habitat.
western mastiff bat	<i>Eumops perotis californicus</i>	None	SSC	No	Chaparral, coastal and desert scrub, coniferous and deciduous forest and woodland; roosts in crevices in rocky canyons and cliffs where the canyon or cliff is vertical or nearly vertical, trees and tunnels	Not expected to roost, moderate potential to forage. The SPA lacks rocky canyons or cliffs that could provide suitable roosting habitat for this species. However, this bat is a far-flying species that could travel from roosting sites to forage over undeveloped areas of the SPA and immediately west of the SPA in the Santa Ana River (WVBWG 2017).
western yellow bat	<i>Lasiorus xanthinus</i>	None	SSC	No	Valley foothill riparian, desert riparian, desert wash, and palm oasis habitats; below 2,000 ft; roost in riparian and palms	Moderate potential to occur. The SPA likely contains palm trees that could provide suitable roosting habitat for this species. In addition, the Santa Ana River, located along the western boundary, contains riparian habitat where this species may also roost. This species would forage in a variety of habitat types, including developed areas, if roost are present nearby.
Invertebrates Delhi Sands flower-loving fly	<i>Rhaphiomidas terminatus abdominalis</i>	FE	None	Yes	Delhi fine sandy soils and dunes, scrub and ruderal vegetation in the sand verbena series with <50% cover	Not expected to occur. One patch of Delhi sands are mapped along the western boundary of the SPA (USDA NRCS 2019); however, this area is currently under development. This species is also not expected to occur immediately west of the SPA in the Santa Ana River due to a lack of Delhi sands (USDA NRCS 2019).

# 4 Mitigation Monitoring and Reporting Program

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## 4.1 Introduction

California Public Resources Code Section 21081.6 requires that, upon certification of an environmental impact report, “the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation.”

A Mitigation Monitoring and Reporting Program (MMRP) is required to ensure that adopted mitigation measures (MMs) and compliance measures (CMs) are successfully implemented for the for the proposed Northside Neighborhood & Pellissier Ranch Specific Plan (Northside Specific Plan). The implementing/monitoring entities may vary between future projects depending on their location and the applicable jurisdiction. The City of Riverside is the lead agency for the proposed program and is responsible for implementation of the MMRP within its jurisdiction. If the City of Colton or County of Riverside choose to adopt the Northside Specific Plan, they shall also be responsible for implementing the MMRP within their jurisdiction as responsible agencies. The City of Riverside and the responsible agencies must adopt this MMRP, or an equally effective program, if it approves the proposed Northside Specific Plan with the mitigation measures that were adopted or made conditions of program approval. This MMRP has been developed in compliance with California Public Resources Code Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.), and includes the following information:

- A list of mitigation measures and CMs
- The timing for implementation of the mitigation measures or CMs
- The entity responsible for ensuring that each mitigation measure or CM is implemented and that monitoring and reporting activities occur
- Monitoring or reporting method for implementation of the mitigation measures or CMs

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4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<b>Aesthetics</b>			
<b>Compliance Measures</b>			
<b>CMA-AES-1: Lighting Design</b>			
Future development shall comply with the Section 19.556.020 of the City of Riverside's Municipal Code that contains the City's lighting design and development standards including regulations surrounding the use of directed, oriented, and shielded lighting to prevent light from shining onto adjacent properties, onto public rights-of-way and into driveway areas. Future development within the jurisdiction of City of Colton or County of Riverside shall comply with the appropriate requirements related to lighting.	Prior to issuance of building permits	Approval of Site Plan	All applicable jurisdictions: City of Riverside - Community & Economic Development Department - Planning Division  City of Colton or County of Riverside
<b>CMA-AES-2: Lighting Intensity</b>			
Future development within the City of Riverside would be required to comply with Section 19.590.707, Light and Glare, that contains regulations regarding the minimum and maximum lighting intensity requirements.	Prior to issuance of building permits	Approval of Site Plan	City of Riverside - Community & Economic Development Department - Planning Division
<b>CMA-AES-3: Lighting and Glare</b>			
Future development within the City of Colton would be required to comply with Chapter 18.42, Performance Standards, Section 18.42.090, Light, and Section 18.42.100, Glare, of the City of Colton's Zoning Code that regulates lighting and glare.	Prior to issuance of building permits	Approval of Site Plan	City of Colton
<b>CMA-AES-4: Solar Design</b>			
Per the City of Colton's standard practice, future solar development shall undergo discretionary architectural and site plan review and approval to ensure the inclusion of adequate design measures to avoid visual impacts. This review shall ensure that the tilt angle and the angle of the solar arrays would be adjusted during the design phase to minimize glare experienced at uses in the vicinity to the satisfaction of the City of Colton.	Prior to issuance of building permits	Approval of Site Plan	City of Colton
<b>Mitigation Measures</b>			
<b>MM-AES-1: View Corridors and Recessed Facades</b>			
As individual residential projects are proposed in Subarea 1, design shall preserve existing east-oriented view corridor off the Santa Ana River Trail and local topographical features such as the Box Springs Mountain Reserve Park to the extent feasible. Building design features may include recessed facades on upper floors to reduce building scale and allow for mountainous topography to remain visible from the Santa Ana River Trail and local topographical features.	Prior to issuance of building permits	Approval of Site Plan and Building Elevations	City of Riverside - Community & Economic Development Department - Planning Division
<b>Air Quality</b>			
<b>Compliance Measures</b>			
<b>CMA-AQ-1: Fugitive Dust Control</b>			
Prior to the issuance of a grading permit for a project within the Northside Specific Plan, grading plans shall identify dust control measures consistent with SCAQMD Rule 403, with a goal of retaining dust on the site.	Prior to issuance of grading permit	Approval of Grading Plan	All applicable jurisdictions: City of Riverside - Community & Economic Development Department Planning Division and Public Works Department  City of Colton or County of Riverside
<b>CMA-AQ-2: Architectural Coating VOC Emissions</b>			
Prior to the issuance of a building permit for a project within the Northside Specific Plan, building plans shall identify the VOC content limits for architectural coatings consistent with SCAQMD's Rule 1113 (Architectural Coatings) on the building plans.	Prior to issuance of building permit	Approval of Construction Plans	All applicable jurisdictions: City of Riverside - Community & Economic Development Department - Building & Safety Division  City of Colton or County of Riverside

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>CM-AQ-3: Title 24 Building Energy Efficiency Standards</b> Prior to the issuance of a building permit, building plans shall demonstrate compliance with the Title 24 Building Energy Efficiency Standards applicable at the time of project implementation.</p>	Prior to issuance of building permit	Approval of Construction Plans	All applicable jurisdictions: City of Riverside - Community & Economic Development Department – Building & Safety Division  City of Colton or County of Riverside
<p><b>CM-AQ-4: Air Quality Management District Compliance</b> Future developments involving stationary and area sources of air pollutant emissions developed under the Northside Specific Plan shall comply with applicable SCAQMD rules and regulations, and obtain a permit from the SCAQMD to construct and a permit to operate. Prior to issuance of occupancy permits, future commercial and industrial businesses shall obtain applicable permits from South Coast Air Quality Management District.</p>	Prior to release of occupancy	Submit evidence that all applicable permits have been obtained from SCAQMD	South Coast Air Quality Management District (SCAQMD)  All applicable jurisdictions: City of Riverside - Community & Economic Development Department – Planning Division  City of Colton or County of Riverside.
<p><b>CM-AQ-5: Transportation Demand Management Regulations</b> Prior to issuance of a certificate of occupancy, future development projects within the City of Riverside shall comply with the City of Riverside Municipal Code Chapter 19.880, and shall prepare a transportation demand management plan as applicable.</p>	Prior to release of occupancy	Submit a transportation demand management plan, as applicable	City of Riverside
<p><b>CM-AQ-6: Vehicle Miles Travelled Guidelines - Transportation Demand Management</b> Per the City of Colton Vehicle Miles Travelled (VMT) Guidelines, future development shall reduce trip lengths and / or number of trips to a project using Transportation Demand Management (TDM) measures as applicable.</p>	Prior to release of occupancy	Submit evidence that all applicable permits have been obtained from SCAQMD	City of Colton
<p><b>CM-AQ-7: Transportation Demand Management Regulation</b> Prior to issuance of a certificate of occupancy, future development projects within the County of Riverside shall comply with the County of Riverside Ordinance No. 726, and shall prepare a transportation demand management plan as applicable.</p>	Prior to release of occupancy	Submit evidence that all applicable permits have been obtained from SCAQMD	County of Riverside
<b>Mitigation Measures</b>			
<p><b>MM-AQ-1: Construction Equipment Emissions Reductions</b> The following measures shall be incorporated to reduce construction criteria air pollutant emissions, including VOC, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, generated by construction equipment used for future development projects implemented under the proposed Northside Specific Plan. Prior to the issuance of a grading permit for projects within the Northside Specific Plan, the following shall be incorporated into the grading plan: a) For off-road equipment with engines rated at 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> 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. 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. The grading permit shall include a condition to require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance.</p>	Prior to the issuance of a grading permit	Submit evidence that all off road equipment meets or exceeds United States Tier 4 Interim.	All applicable jurisdictions: City of Riverside - Community & Economic Development Department – Planning Division and Public Works Department  City of Colton or County of Riverside.

1 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.

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p>b) Minimize simultaneous operation of multiple construction equipment units. During construction, vehicles in loading and unloading queues shall not idle for more than 5 minutes, and shall turn their engines off when not in use to reduce vehicle emissions.</p> <p>c) Properly tune and maintain all construction equipment in accordance with manufacturer's specifications;</p> <p>d) Require construction equipment such as concrete/industrial saws, pumps, aerial lifts, material hoists, 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: <a href="https://www.forconstructionpros.com/construction-technology/article/21107531/electrified-construction-equipment-gaining-momentum">https://www.forconstructionpros.com/construction-technology/article/21107531/electrified-construction-equipment-gaining-momentum</a>.</p> <p>e) To reduce the need for electric generators and other fuel-powered equipment, provide on-site electrical hookups for the use of hand tools such as saws, drills, and compressors used for building construction. Develop a Construction Traffic Control Plan to ensure construction traffic and equipment use is minimized to the extent practicable. The Construction Traffic Control Plan shall include measures to reduce the number of large pieces of equipment operating simultaneously during peak construction periods, scheduling of vendor and haul truck trips to occur during non-peak hours, establish dedicated construction parking areas to encourage carpooling and efficiently accommodate construction vehicles, identify alternative routes to reduce traffic congestion during peak activities, and increase construction employee carpooling.</p> <p>f) 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 NO<sub>x</sub> emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, operators must 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 NO<sub>x</sub> emissions or newer, cleaner trucks and equipment. To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used, operators must maintain records of all trucks associated with the construction activities, and make these records available to the jurisdiction issuing the grading permit upon request. Alternatively, the jurisdiction may require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasible and practicable to enforce the use of specific equipment.</p>			
<p><b>MN-AQ-2: Fugitive Dust Control</b></p> <p>The following measures shall be incorporated to further reduce construction fugitive dust emissions (PM10 and PM2.5), generated by grading and construction activities of future development projects implemented under the proposed Specific Plan:</p> <p>Prior to the issuance of a grading permit for projects within the Northside Specific Plan, the following shall be incorporated into the grading plan:</p> <ol style="list-style-type: none"> <li>Water or another SCAQWD-approved dust control non-toxic agent shall be utilized on the grading areas at least three times daily to minimize fugitive dust.</li> <li>All permanent roadway improvements shall be constructed and paved as early as possible in the construction process to reduce construction vehicle travel on unpaved roads. To reduce fugitive dust from earth-moving operations, building pads shall be finalized as soon as possible following site preparation and grading activities.</li> <li>Stabilize grading areas as quickly as possible to minimize fugitive dust.</li> <li>Apply chemical stabilizer, install a gravel pad, or pave the last 400 feet of internal travel path within the construction site prior to public road entry, and to on-site stockpiles of excavated material.</li> <li>Remove any visible track-out into traveled public streets with the use of sweepers, water trucks, or similar method as soon as possible.</li> <li>Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. Unpaved construction site egress points shall be graveled to prevent track-out.</li> <li>Wet wash the construction access point at the end of the workday if any vehicle travel on unpaved surfaces has occurred.</li> <li>Cover haul trucks or maintain at least 2 feet of freeboard to reduce blow-off during hauling.</li> <li>Evaluate the need for reduction in dust generating activity, potential to stop work, and/or implementation of additional dust control measures if winds exceed 25 miles per hour.</li> <li>Enforce a 15-mile-per-hour speed limit on unpaved surfaces.</li> <li>Provide haul truck staging areas for the loading and unloading of soil and materials. Staging areas shall be located away from sensitive receptors, at the furthest feasible distance.</li> </ol>	<p>Prior to begin construction and grading</p>	<p>Submit evidence to the City that SCAQMD Form 403-N has been submitted to SCAQMD and that all applicable permits have been obtained from SCAQMD</p> <p>Periodic inspection by Building or Public Works Inspector</p>	<p>South Coast Air Quality Management District (SCAQMD)</p> <p>All applicable jurisdictions: City of Riverside - Community &amp; Economic Development Department Building &amp; Safety Division and Public Works Department</p> <p>City of Colton, or County of Riverside</p>

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p>l) Construction Traffic Control Plans shall route delivery and haul trucks required during construction away from sensitive receptor locations and congested intersections, to the extent feasible. Construction Traffic Control Plans shall be finalized and approved prior to issuance of grading permits.</p> <p>m) Review and comply with any additional requirements of SCAQMD Rule 403.</p>			
<p><b>MM-AQ-3: Architectural Coating VOC Emissions</b></p> <p>To address the impact relative to VOC emissions, Super-Compliant VOC-content architectural coatings (0 grams per liter to less than 10 grams per liter VOC) shall be used during Project construction/application of paints and other architectural coatings to reduce ozone precursors. If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, avoid application of architectural coatings during the peak smog season: July, August, and September. Procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 11.113 (Architectural Coatings).</p>	<p>Prior to issuance of building permits</p>	<p>Include a construction schedule on the construction plans demonstrating application of architectural coatings will not occur during the peak smog season</p>	<p>All applicable jurisdictions: City of Riverside - Community &amp; Economic Development Department - Planning Division and Public Works Department  City of Colton, or County of Riverside</p>
<p><b>MM-AQ-4: Encourage Electric Vehicles</b></p> <p>Future projects within the Northside Specific Plan shall comply with the following:</p> <ol style="list-style-type: none"> <li>Designate 10% of parking spaces to be for electric and alternative fuel vehicles.</li> <li>Install Level 2 EV charging stations in 6% of all parking spaces.</li> </ol>	<p>Project design and prior to grading/building permit issuance</p>	<p>Approval of Site Plan</p>	<p>All applicable jurisdictions: City of Riverside - Community &amp; Economic Development Department - Building &amp; Safety Division and Public Works Department  City of Colton, or County of Riverside</p>
<p><b>MM-AQ-5: Idling Restriction</b></p> <p>Future projects within the Northside Specific Plan shall minimize idling time of all vehicles and equipment to the extent feasible; idling for periods of greater than five (5) minutes shall be prohibited. Signage shall be posted at truck parking spots, entrances, and truck bays advising that idling time shall not exceed five (5) minutes per idling location. To the extent feasible, future tenants shall restrict idling emission from trucks by using auxiliary power units and electrification. Each cold storage dock door shall provide electrification for transport refrigeration units (TRUs).</p>	<p>Prior to release of occupancy</p>	<p>Inspection prior to issuance of a Certificate of Occupancy</p>	<p>All applicable jurisdictions: City of Riverside - Community &amp; Economic Development Department - Planning Division and Building &amp; Safety Division  City of Colton, or County of Riverside</p>
<p><b>MM-AQ-6: Energy Conservation</b></p> <p>The following energy conservation measures shall be incorporated into building plans of future projects:</p> <ol style="list-style-type: none"> <li>Install a solar photovoltaic rooftop system to reduce the electric demand from the local grid.</li> <li>Install Energy Star rated heating, cooling lighting, and appliances.</li> <li>Outdoor lighting shall be light emitting diodes (LED) or other high efficiency lightbulbs.</li> <li>Provide information on energy efficiency, energy efficient lighting and lighting control systems, energy management, and existing energy incentive programs to future tenants of the Northside Specific Plan.</li> <li>Non-residential structures shall meet the U.S. Green Building Council standards for cool roofs. This is defined as achieving a 3-year solar reflective index (SRI) of 64 for a low-sloped roof and 32 for a high-sloped roof.</li> <li>Outdoor pavement, such as walkways and patios, shall include paving materials with 3-year SRI of 0.28 or initial SRI of 0.33.</li> <li>Construction of modest cool roof, defined as Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance and 0.75 thermal emittance.</li> <li>Use of Heating, Ventilation and Air Conditioning (HVAC) equipment with a Seasonal Energy Efficiency Ratio (SEER) of 12 or higher.</li> <li>Installation of water heaters with an energy factor of 0.92 or higher.</li> <li>Maximize the use of natural lighting and include daylighting (e.g., skylights, windows) in rooms with exterior walls that would normally be occupied.</li> <li>Include high-efficacy artificial lighting in at least 50% of unit fixtures.</li> <li>Install low-NOx water heaters and space heaters, solar water heaters, or tank-less water heaters.</li> </ol>	<p>Prior to issuance of building permits and release of occupancy</p>	<p>Approval of building plans Inspection prior to issuance of Certificate of Occupancy</p>	<p>All applicable jurisdictions: City of Riverside - Community &amp; Economic Development Department - Planning Division and Building &amp; Safety Division  City of Colton, or County of Riverside</p>

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p>m) Use passive solar cooling/heating.  n) Strategically plant trees to provide shade.  o) Structures shall be equipped with outdoor electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment.</p>			
<p><b>MM-AQ-7: Low-VOC/Green Cleaning Product Educational Program</b>  Future tenants shall develop and implement a Low-VOC/Green Cleaning Product and Paint education program.</p>	<p>Prior to issuance of building permits</p>	<p>Provide documentation of the green cleaning, product and paint education program</p>	<p>All applicable jurisdictions:  City of Riverside - Community &amp; Economic Development Department - Planning Division and Building &amp; Safety Division  City of Colton or County of Riverside</p>
<p><b>MM-AQ-8: Health Risk Siting</b>  Future projects shall minimize exposure of new sensitive receptors to toxic air contaminants (TACs), to the extent possible, and consider distance, orientation, and wind direction when siting TAC-emitting sources near sensitive land uses to minimize exposure and associated health risk.</p>	<p>Prior to entitlement approval.</p>	<p>Approval of site plan</p>	<p>All applicable jurisdictions:  City of Riverside - Community &amp; Economic Development Department - Planning Division  City of Colton or County of Riverside</p>
<p><b>MM-AQ-9: Toxic Air Contaminant Reduction</b>  Prior to the approval of a use that would generate new sources of TAC emissions (i.e., light industrial, distribution centers, gasoline dispensing facilities, dry cleaners) in close proximity to existing sensitive land uses, require development projects to implement applicable best management practices, as necessary and feasible, that will reduce exposure to TACs. Specific reduction measures will be evaluated and determined depending on proposed land use TAC sources and feasibility.</p>	<p>Prior to entitlement approval</p>	<p>Approval of site plan</p>	<p>All applicable jurisdictions:  City of Riverside - Community &amp; Economic Development Department - Planning Division  City of Colton, or County of Riverside).</p>
<p><b>MM-AQ-10: Health Risk Assessment Requirements</b>  Consistent with the California Air Resources Board's recommendations on siting new sensitive land uses, a formal health risk assessment shall be performed for future projects if the following conditions apply:</p>	<p>Prior to entitlement approval</p>	<p>Approval of site plan and acceptance of the Health Risk Assessment</p>	<p>South Coast Air Quality Management District (SCAQMD)  All applicable jurisdictions:  City of Riverside - Community &amp; Economic Development Department - Planning Division  City of Colton or County of Riverside</p>
<p>a) <i>Distribution Centers.</i> 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. In addition, configuration of entry and exit points of the distribution center shall be considered to minimize exposure to sensitive receptors.  b) <i>Gasoline Dispensing Facilities.</i> For any large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) within 300 feet of a sensitive receptor. For any typical gas dispensing facility (with a throughput of less than 3.6 million gallons per year) within 50 feet of a sensitive receptor.  c) <i>Dry Cleaners Using Perchloroethylene.</i> For any dry-cleaning operation within 300 feet of a sensitive receptor. For operations with three or more machines, consult with the South Coast Air Quality Management District for when a health risk assessment shall be prepared as the distance to the closest sensitive receptor may be less than 300 feet.  d) <i>Other Sources of Toxic Air Contaminants.</i> For other sources of TACs, the City shall evaluate the need to prepare a health risk assessment based on the types of TACs and the distance to sensitive receptors. This includes requiring a health risk assessment to for any development proposing to site sensitive receptors within 500 feet of a freeway that has 100,000 vehicles on an average day in accordance with CARB requirements.</p>	<p>Prior to entitlement approval or building permit, if no entitlement is required</p>	<p>Approval of site plan</p>	<p>All applicable jurisdictions:  City of Riverside - Community &amp; Economic Development Department - Planning Division and Building &amp; Safety Division</p>
<p><b>MM-AQ-11: Odor Siting</b>  Future land uses that have the potential to generate objectionable odors shall be located as far away as possible and/or downwind from sensitive receptors.</p>	<p>Prior to entitlement approval or building permit, if no entitlement is required</p>	<p>Approval of site plan</p>	<p>All applicable jurisdictions:  City of Riverside - Community &amp; Economic Development Department - Planning Division and Building &amp; Safety Division</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>MM-AQ-12: Odor Abatement Plan</b></p> <p>Any odor generated by a land use shall implement an Odor Abatement Plan (OAP). The OAP shall include the following:</p> <ul style="list-style-type: none"> <li>a) Name and telephone number of contact person(s) at the facility responsible for logging in and responding to odor complaints.</li> <li>b) Policy and procedure describing the actions to be taken when an odor complaint is received, including the training provided to the staff on how to respond.</li> <li>c) Description of potential odor sources at the facility.</li> <li>d) Description of potential methods for reducing odors, including minimizing idling of delivery and service trucks and buses, process changes, facility modifications, and/or feasible add-on air pollution control equipment.</li> <li>e) Contingency measures to curtail emissions in the event of a public nuisance complaint.</li> </ul>	<p>Prior to issuance of building permits</p>	<p>Submit the Odor Abatement Plan for approval</p>	<p>City of Colton or County of Riverside</p> <p>All applicable jurisdictions:                      City of Riverside - Community &amp; Economic Development Department                      - Planning Division and Building &amp; Safety Division                      City of Colton or County of Riverside</p>
<p><b>Biological Resources</b></p>			
<p><b>Compliance Measures</b></p>			
<p><b>CM-BIO-1: Federal Endangered Species Act Compliance</b></p> <p>Future development shall comply with the Federal Endangered Species Act (FESA). Typically, future development that would result in "take" of any federally listed threatened or endangered species would be required to obtain authorization from the National Marine Fisheries Service and/or the U.S. Fish and Wildlife Service (USFWS) through either Section 7 (if there is a federal nexus) or Section 10(a) (incidental take permit). However, FESA does not protect plants, unless there is a federal nexus.</p>	<p>Prior to ground disturbance or issuance of grading permits</p>	<p>Provide evidence of issuance of regulatory permits related to potential impacts to protected species</p>	<p>California Department of Fish &amp; Wildlife                      United States Fish &amp; Wildlife Service                      National Marine Fisheries Service                      Qualified Biologist                      All applicable jurisdictions:                      City of Riverside - Community &amp; Economic Development Department                      - Planning Division                      City of Colton or County of Riverside</p>
<p><b>CM-BIO-2: Wetland Regulatory Agency Compliance</b></p> <p>Future development shall comply with the requirements of the wetland regulatory agencies and obtain permits, when applicable, including the following permits: (1) a Section 404 permit from the U.S. Army Corps of Engineers; (2) a Section 401 permit from the Regional Water Quality Control Board; and (3) a Streambed Alteration Agreement from the California Department of Fish and Game.</p>	<p>Prior to ground disturbance, or issuance of grading permits</p>	<p>Provide evidence of issuance of regulatory permits related to potential impacts to wetlands</p>	<p>California Department of Fish &amp; Wildlife                      United States Fish &amp; Wildlife Service                      United States Army Corps of Engineers                      Santa Ana Regional Water Quality Control Board                      All applicable jurisdictions:                      City of Riverside - Community &amp; Economic Development Department                      - Planning Division                      City of Colton or County of Riverside</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>CM-BIO-3: Vegetation Ordinance Compliance</b></p> <p>Future development within the City of Colton shall obtain permits from the City's Public Works Director for any impacts to trees, shrubs, or plants covered under Municipal Code 12.20.040 of the code.</p>	<p>Prior to ground disturbance, or issuance of grading permits</p>	<p>Provide evidence of issuance of regulatory permits related to potential impacts to vegetation</p>	<p>California Department of Fish &amp; Wildlife City of Colton</p>
<p><b>Mitigation Measures</b></p>			
<p><b>MM-BIO-1a: Special-Status Plant Habitat Assessment, Focused Surveys, and Mitigation</b></p> <p><b>Outside of the Western Riverside County Multiple Habitat Conservation Plan (MSHCP).</b> Prior to ground disturbance or issuance of a grading permit involving projects on 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 shall be conducted by a Qualified Biologist. If there are special-status plants, then mitigation shall be required. If State-listed plants have the potential to be impacted, the applicant shall apply for Incidental Take Permit through the California Department of Fish and Wildlife for authorization of those impacts.</p> <p>For special-status plants, if 100% of the area with the species cannot be avoided, then mitigation, in the form of mitigation credits or land acquisition and conservation, would be required Agency-approved Habitat mitigation credits or occupied replacement lands shall be purchased at a minimum 3:1 ratio (acres mitigated acres impacted).</p>	<p>Prior to ground disturbance or issuance of grading permits.</p>	<p>Provide evidence of issuance of regulatory permits related to potential impacts to vegetation</p>	<p>California Department of Fish &amp; Wildlife County of Riverside</p>
<p><b>MM-BIO-1b: Special-Status Plant Habitat Assessment, Focused Surveys, and Mitigation</b></p>			
<p><b>Inside the MSHCP:</b> The federally and state-listed species that have a low potential to occur in the SPA in the MSHCP are covered under the MSHCP, and "take" coverage and measures are included in the MSHCP as long as species-specific requirements are met. Additionally, non-listed special-status plants with a moderate potential to occur are also covered under the MSHCP and mitigated by complying with the MSHCP.</p> <p>Approximately 180 acres of the SPA lies with Narrow Endemic Plant Species Survey Area (NEPSSA) No. 7. Future development in NEPSSA No. 7 would require a habitat assessment for San Diego ambrosia (low potential to occur), Brand's phacelia (not expected to occur), and San Miguel savory (low potential to occur) (Figure 3.3-4). Western Riverside MSHCP). Therefore, a site-specific habitat assessment shall be required for all future development in the 180-acre portion of the SPA in NEPSSA No. 7 prior to construction. If a suitable habitat is found, a focused rare plant survey must be completed when the NEPSSA No. 7 species would be visible. Where survey results are positive for Narrow Endemic Plant Species, any future development with the potential to affect Narrow Endemic Plant Species shall be subject to avoidance of 90% of those portions of the project site that provide for long-term conservation value of the identified Narrow Endemic Plant Species until it is demonstrated that conservation goals for the particular species are met. Equivalency findings must be made as described in Section 6.3.2 of the MSHCP. If it is determined that the 90% threshold cannot be met and achievement of overall MSHCP conservation goals for the particular species have not yet been demonstrated, then the applicant must prepare a determination of biologically equivalent or superior preservation (DBESP) document that will include measures to reduce significant impacts similar to those as described for areas outside the MSHCP. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife as described in the Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future California Environmental Quality Act document approvals. Once the DBESP is approved, the applicant shall implement the DBESP measures. No additional surveys or further measures are required for special-status plants in the MSHCP.</p>	<p>Prior to ground disturbance or issuance of grading permits.</p>	<p>Submit a Special Status Habitat Assessment and DBESP, if applicable, for acceptance by the applicable jurisdiction and regulatory agency</p> <p>Provide evidence of issuance of regulatory permits related to potential impacts to vegetation</p>	<p>California Department of Fish &amp; Wildlife United States Fish &amp; Wildlife Service</p> <p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department – Planning Division County of Riverside</p>
<p><b>MM-BIO-2: Standard Best Management Practices (BMPs)</b></p>			
<p>Prior to ground disturbance or issuance of a grading or construction permit within the Northside Specific Plan undeveloped lands or within 500 feet of such lands (including projects adjacent to the Santa Ana River), the following BMPs shall be included on grading and construction plans notes. The applicable jurisdiction (i.e., City of Colton, City of Riverside, or County of Riverside) shall have the right to access and inspect any sites of approved projects, including any restoration/enhancement area for compliance with project approval conditions including these BMPs. Within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), these measures are also consistent with MSHCP Volume 1, Appendix D.</p> <p><b>Lighting</b></p>	<p>Prior to ground disturbance or issuance of grading permits or construction permit</p>	<p>Submit evidence of the completed training session</p> <p>Approval of Erosion Control Plan showing location of equipment and staging areas</p> <p>Periodic inspections</p>	<p>California Department of Fish &amp; Wildlife United States Fish &amp; Wildlife Service United States Army Corps of Engineers</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p>• Within 500 feet of the suitable habitat for special-status wildlife, construction performed outside the hours of 7:00 p.m. and 7:00 a.m. on weekdays and outside the hours of 5:00 p.m. and 8:00 a.m. on Saturdays (per the City's Title 7 – Noise Control ordinances) shall use minimal illumination in order to perform the work safely. All lighting shall be directed downward and shielded to focus illumination on the desired work areas only, and to prevent light spillage onto adjacent habitat.</p> <p><b>Debris/Pollution</b></p> <ul style="list-style-type: none"> <li>• Fully covered trash receptacles that are animal-proof will be installed and used during construction to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Trash contained within the receptacles will be removed at least once a week from the project site.</li> <li>• No litter, construction materials, or debris will be discharged into jurisdictional waters or MSHCP riparian/riverine sources.</li> <li>• Construction work areas shall be kept clean of debris, trash, and construction materials.</li> </ul> <p><b>Measures to Avoid Impacts to Streambed and Water Quality</b></p> <ul style="list-style-type: none"> <li>• Erode fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.</li> <li>• Projects shall be designed to avoid the placement of equipment and personnel within the stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern, as feasible. Projects that cannot be conducted without placing equipment or personnel in sensitive habitats shall be timed to avoid the breeding season of riparian species.</li> <li>• When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing or other sediment trapping materials shall be installed at the downstream end of construction activity to minimize the transport of sediments off site. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from reentering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream.</li> <li>• Water pollution and erosion control plans shall be developed and implemented in accordance with Regional Water Quality Control Board (RWQCB) requirements as described in Northside Specific Plan Program Environmental Impact Report <b>CM-HYD-1</b>.</li> </ul> <p><b>Vehicle and Equipment Restrictions and Maintenance</b></p> <ul style="list-style-type: none"> <li>• Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas, other sensitive habitats, and jurisdictional waters of the United States/state. These designated areas shall be located in such a manner as to prevent any runoff from entering these sensitive habitats. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials shall be reported to appropriate entities including but not limited to applicable jurisdictional city or County, U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and/or RWQCB and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.</li> </ul> <p><b>Environmental Awareness Training and Biological Monitoring</b></p> <p><b>Worker Environmental Awareness Program (WEAP) and Ongoing Training</b></p> <p>Prior to grading, a preconstruction meeting shall be required that includes a training session for project personnel by a qualified biologist. The training shall include: (1) a description of the species of concern and its habitats; (2) the general provisions of the applicable regulations pertaining to biological resources, including the Endangered Species Act and the MSHCP; (3) the need to adhere to the provisions of the Endangered Species Act and the MSHCP and other applicable regulations; (4) the penalties associated with violating the provisions of the Endangered Species Act and other applicable regulations; (5) the general measures that are being implemented to conserve the species of concern as they relate to the project; and (6) the access routes to and project site boundaries within which the project activities must be accomplished.</p> <p>Additionally, WEAP shall include the measures and mitigation requirements for the applicable resources. Copies of the mitigation measures and any required permits from the resource agencies shall be made available to construction personnel.</p> <p>A training program, such as training video, coordinated by the project biologist, may also be used.</p>			<p>Santa Ana Regional Water Quality Control Board</p> <p>Biological monitor</p> <p>Construction Superintendent</p> <p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department – Planning Division and Public Works Department</p> <p>City of Colton or County of Riverside</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>Biological Monitoring and Compliance Documentation</b> A qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat, species of concern, and other sensitive biological resources outside the project footprint.</p> <p><b>Minimization of Disturbance</b></p> <ul style="list-style-type: none"> <li>The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.</li> <li>The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species.</li> <li>The upstream and downstream limits of project disturbance plus lateral limits of disturbance on either side of the stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work.</li> <li>Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.</li> </ul> <p><b>Exotic Species</b></p> <ul style="list-style-type: none"> <li>Exotic species that prey upon or displace target species of concern shall be permanently removed from the site to the extent feasible.</li> </ul>			
<p><b>M-BIO-3: Restoration of Temporary Impacts to Uplands with Non-Invasive Species</b> Prior to ground disturbance or issuance of a grading or construction permit of projects within the Northside Specific Plan on undeveloped lands, grading and construction plans shall include the following note regarding temporary impacts to uplands:  Site construction areas subjected to temporary ground disturbance in undeveloped areas disturbance activity, and revegetated with an application of a native seed mix, if necessary, prior to or during seasonal rains to promote passive restoration of the area to pre-project conditions (except that no invasive plant species will be restored). An area subjected to "temporary" disturbance means any area that is disturbed but will not be subjected to further disturbance as part of the project. If any grading occurred in areas intended to remain undeveloped, the site will be recontoured to natural grade. This measure does not apply to situations in urban/developed areas that are temporarily impacted and will be returned to an urban/developed land use. Prior to seeding temporary ground disturbance areas, the project biologist will review the seeding palette to ensure that no seeding of invasive plant species, as identified in the most recent version of the California Invasive Plant Inventory for the region, will occur.</p>	<p>Prior to ground disturbance, issuance of a grading or construction permit.</p>	<p>Approval of grading plan</p>	<p>Biologist All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department – Planning Division and Public Works Department  City of Colton or County of Riverside</p>
<p><b>MM-BIO-4: Avoidance/Minimization of Long-term Indirect Impacts to Special-Status Species</b> Prior to ground disturbance or issuance of a construction permit within 500 feet of suitable habitat for special-status species (including the Santa Ana River) with potential to occur in the Specific Plan Area (SPA), construction plans and conditions of approval shall include the following to address indirect impacts to special-status species:  <b>Drainages:</b> Future development within 500 feet of suitable habitat for special-status species shall incorporate measures, including measures required through the National Pollutant Discharge Elimination System requirements, to ensure that the quantity and quality of runoff discharged is not altered in an adverse way when compared with existing conditions. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into suitable habitat for special-status species. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, or other elements that might degrade or harm biological resources or ecosystem processes. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. Regular maintenance shall occur to ensure effective operations of runoff control systems.  <b>Toxics:</b> Future proposed projects that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharges. Measures such as those employed to address drainage issues shall be implemented.</p>	<p>Prior to ground disturbance, issuance of a building permit within 500 feet of suitable habitat for special-status species, issuance of a grading permit  Operation</p>	<p>Approval of Storm Water Prevention Plan (SWPPP) Approval of Water Quality Management Plan (WQMP) Approval of site plan Approval of lighting plan</p>	<p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department – Planning Division, Building &amp; Safety Division, and Public Works Department, Parks, Recreation, and Community Services Department,  City of Colton or County of Riverside</p>

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>Lighting:</b> Night lighting shall be directed away from suitable habitat for special-status species to protect species from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting is not increased. Energy-efficient LPS or HPS lamps shall be used exclusively to dampen glare, in accordance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), where applicable.</p> <p><b>Noise:</b> Proposed noise-generating land uses affecting suitable habitat for special-status species shall incorporate setbacks, berms, or walls to minimize the effects of noise on resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards. For planning purposes, wildlife should not be subject to noise that would exceed residential noise standards.</p> <p><b>Invasives:</b> When approving landscape plans for future development, invasive, non-native plant species listed on the most recent California Invasive Plant Council inventory (<a href="https://www.cal-ipc.org/plants/inventory/">https://www.cal-ipc.org/plants/inventory/</a>) with a rating of moderate or high shall not be included in landscaping. For future development within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), invasive, non-native species listed in MSHCP Section 6.1.4, Table 6-2, will also be prohibited in landscaping.</p> <p><b>Barriers:</b> Future development shall incorporate barriers, where appropriate in individual project designs, to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in suitable habitat for special-status wildlife. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage, and/or other appropriate mechanisms.</p> <p><b>Grading/Land Development:</b> Manufactured slopes associated with future development within the SPA shall not extend into the Santa Ana River or other suitable habitat for special-status species that would be avoided and/or conserved.</p>			
<p><b>MM-BIO-5a: San Bernardino Kangaroo Rat, Stephens' Kangaroo Rat, and Los Angeles Pocket Mouse Mitigation</b></p> <p><b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</b> Prior to ground disturbance or issuance of grading permits for projects within the Northside Specific Plan areas outside of the MSHCP on undeveloped lands, a 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. 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 San Bernardino kangaroo rat or Stephen's kangaroo rat is present on the site, an incidental take permit and mitigation at no less than 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.</p>	<p>Thirty days prior to any ground disturbance, or issuance of grading permit</p>	<p>Submit a Pre-construction survey report for acceptance by the application jurisdiction</p>	<p>California Department of Fish &amp; Wildlife City of Colton</p>
<p><b>MM-BIO-5b: San Bernardino Kangaroo Rat, Stephens' Kangaroo Rat, and Los Angeles Pocket Mouse Mitigation</b></p> <p><b>Inside of the MSHCP:</b> Approximately 12 acres of the SPA are located with the San Bernardino kangaroo rat and Los Angeles pocket mouse survey area. Prior to construction, any future development in the MSHCP San Bernardino kangaroo rat and Los Angeles pocket mouse survey area would require a habitat assessment and focused surveys, if suitable habitat is present. There is no official survey protocol (assessment and trapping) required in the MSHCP; however, the MSHCP Biological Monitoring Program has developed and refined a survey protocol that should be used as a guide to assess if adequate Los Angeles pocket mouse and San Bernardino kangaroo rat surveys have been conducted (refer to Los Angeles pocket mouse and San Bernardino kangaroo rat Survey Reports at the MSHCP website: <a href="http://wrc-ra.org/about-rca/monitoring/monitoringsurveys/">http://wrc-ra.org/about-rca/monitoring/monitoringsurveys/</a>). If presence of San Bernardino kangaroo rat or Stephens' kangaroo rat is known or assumed to occur on the project site located inside 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.</p> <p>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 and equivalency findings shall be made as described in the Section 6.3.2 of the MSHCP. If the 90% avoidance threshold cannot be met, then the applicant must prepare a determination of biological equivalent or superior preservation (DBESP) document that proposes on measures to reduce significant impacts to these species similar to those described for other small mammals in areas outside the MSHCP. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, USFWS, and CDFW as described in the Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future CEQA document approvals. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of</p>	<p>Prior to issuance of a grading permit and prior to construction</p>	<p>Submit a Habitat Assessment and Focus Survey for acceptance by the applicable jurisdiction and regulatory agencies</p>	<p>California Department of Fish &amp; Wildlife United States Fish &amp; Wildlife Service All applicable jurisdictions: City of Riverside - Community &amp; Economic Development Department - Planning Division, Building &amp; Safety Division, and Public Works Department County of Riverside</p>

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<p>approval, as applicable. The SPA does not overlap with Stephens' kangaroo rat Core Reserve Areas designated in the SKR Habitat Conservation Plan (SKR HCP) but is located within the SKR HCP fee area. As a covered species, "take" of this species would be authorized within the SPA. Also, the applicant must pay the standard SKR HCP Development Mitigation Fee.</p>			
<p><b>MM-BIO-0a: Vernal Pools and Fairy Shrimp Habitat Assessment, Focused Surveys, and Mitigation</b></p>			
<p>Prior to ground disturbance or issuance of a grading permit for projects on undeveloped sites within the Northside Specific Plan, a habitat assessment shall be conducted by a Qualified Biologist to determine whether there are vernal pools or other habitat suitable for fairy shrimp present on the site. If there is suitable habitat, then fairy shrimp surveys must be conducted pursuant to USFWS Survey Guidelines for the Listed Large Branchiopods (USFWS 2019b). If the first survey is negative for listed fairy shrimp, then an additional season (wet or dry, whichever one wasn't already conducted) of surveys shall be completed as well. If presence of listed fairy shrimp is known or assumed to occur on the project site, the following measures shall be noted on the grading plan prior to grading permit issuance and required to be implemented by the applicant.</p>	<p>Prior to ground disturbance or issuance of a grading permit.</p>	<p>Submit a Habitat Assessment and Focus Survey for acceptance by the applicable jurisdiction and regulatory agencies</p>	<p>United States Fish &amp; Wildlife Service All applicable jurisdictions: City of Riverside -- Community &amp; Economic Development Department - Planning Division, Building &amp; Safety Division, and Public Works Department County of Riverside</p>
<p><b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</b> Based on the Qualified Biologist assessment and surveys for listed fairy shrimp, creation and/or enhancement of suitable habitat for the applicable species of fairy shrimp shall be required at a minimum ratio of 2:1. This effort shall include salvage of fairy shrimp cysts from impacted habitat and relocation into the created and/or enhanced suitable habitat. The created and/or enhanced suitable habitat shall be conserved via a conservation easement or other method approved by the U.S. Fish and Wildlife (USFWS). Prior to the issuance of a grading permit, a take permit from the USFWS shall be obtained as described in Northside Specific Plan Program Environmental Impact Report <b>CM-BIO-1</b>, and measures may be refined with further input from the USFWS.</p>			
<p><b>MM-BIO-0b: Vernal Pools and Fairy Shrimp Habitat Assessment, Focused Surveys, and Mitigation</b></p>			
<p>Prior to ground disturbance or issuance of a grading permit on undeveloped sites within the Northside Specific Plan, a habitat assessment shall be conducted by a Qualified Biologist to determine whether there are vernal pools or other habitat suitable for fairy shrimp present on the site. If there is suitable habitat, then fairy shrimp surveys must be conducted pursuant to USFWS Survey Guidelines for the Listed Large Branchiopods (USFWS 2019b). If the first survey is negative for listed fairy shrimp, then an additional season (wet or dry, whichever one wasn't already conducted) of surveys shall be completed as well. If presence of listed fairy shrimp is known or assumed to occur on the project site, the following measures shall be noted on the grading plan prior to grading permit issuance and required to be implemented by the applicant.</p> <p><b>Inside of the MSHCP:</b> Based on the Qualified Biologist assessment and surveys for listed fairy shrimp, <b>90% of the habitat with long-term conservation value must be avoided.</b> If the 90% avoidance threshold cannot be met, then the applicant must prepare a determination of biological equivalent or superior preservation (DBESP) document and would propose measures similar to those applicable to areas outside of the MSHCP. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, USFWS, and California Department of Fish and Wildlife as described in the Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future California Environmental Quality Act document approvals. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p>	<p>Prior to ground disturbance or issuance of a grading permit.</p>	<p>Submit a Habitat Assessment and Fairy Shrimp Survey, if applicable, for acceptance by the applicable jurisdiction and regulatory agencies</p>	<p>United States Fish &amp; Wildlife Service All applicable jurisdictions: City of Riverside -- Community &amp; Economic Development Department - Planning Division, Building &amp; Safety Division, and Public Works Department County of Riverside</p>
<p><b>MM-BIO-7a: Coastal California Gnatcatcher Surveys</b></p>			
<p><b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</b> Prior to ground disturbance or issuance of a grading permit on undeveloped sites within the Northside Specific Plan a Qualified Biologist shall conduct a habitat assessment for coastal California gnatcatcher (<i>Polioptila californica californica</i>). If there is suitable habitat for coastal California gnatcatcher present, a focused protocol-level survey using the most recent U.S. Fish and Wildlife Service (USFWS) protocol for the species, which is currently Coastal California Gnatcatcher Presence/Absence Survey Guidelines (USFWS 1997). If presence of coastal California gnatcatcher 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:</p> <p>Based on the Qualified Biologist assessment and surveys for coastal California gnatcatcher, suitable habitat for the species must be conserved at a minimum of a 2:1 ratio, depending on the quality of habitat impacts and the quality of habitat conserved determined to be present by the Qualified Biologist. No clearing, grubbing, grading, or other construction activities shall occur during the coastal California gnatcatcher breeding season (March 1 to August 15). If construction activities cannot be completed outside coastal California gnatcatcher breeding season, then a pre-construction survey shall be conducted in all areas of suitable habitat, by a Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) Recovery Permit). If found during pre-construction surveys, a 500-foot buffer will be</p>	<p>Prior to ground disturbance or issuance of a grading permit.</p>	<p>Submit a Habitat Assessment and Focused Protocol-Level Survey for the coastal California gnatcatcher for acceptance by the applicable jurisdiction and regulatory agencies</p>	<p>United States Fish &amp; Wildlife Service All applicable jurisdictions: City of Riverside -- Community &amp; Economic Development Department - Planning Division, Building &amp; Safety Division, and Public Works Department County of Riverside</p>

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<p>required around the nest site. Additionally, prior to issuance of a grading permit on undeveloped sites with confirmed presence of coastal California gnatcatcher, a take permit from the USFWS would be required as described in Northside Specific Plan Program Environmental Impact Report CM-BIO-1 and measures may be refined with future input from the USFWS.</p>			
<p><b>MM-BIO-7b. Coastal California Gnatcatcher Surveys</b>  <b>Inside of the MSHCP.</b> Coastal California gnatcatcher is a covered species under the MSHCP, and no additional surveys are required for areas inside the MSHCP. Direct impacts to nesting coastal California gnatcatchers would be avoided through implementation of nesting bird surveys and seasonal restrictions on occupied habitat removal, as described in MM-BIO-13.</p>	<p>Prior to issuance of a grading or construction permit. Refer to MM-BIO-13</p>	<p>Payment of impact fees. If applicable, submit Nesting Bird Survey for acceptance by the applicable jurisdiction</p>	<p>All applicable jurisdictions:                      City of Riverside -- Community &amp; Economic Development Department                      – Planning Division, and Building &amp; Safety Division</p>
<p><b>MM-BIO-8a. Burrowing Owl Pre-Construction Surveys and Avoidance Measures</b>  <b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).</b> Prior to ground disturbance or issuance of a grading permit 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, then breeding seasons 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 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 2:1 ratio. In addition, following measures shall be completed prior to grading permit issuance outside of the MSHCP. 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. A smaller buffer may be established if the qualified biologist determines a reduced buffer would not adversely affect the burrowing owl(s). If avoidance of active burrows is infeasible, a qualified biologist shall 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. 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 of 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.</p>	<p>Fourteen days prior any vegetation removal or ground-disturbing activities or issuance of a grading permit</p>	<p>Submit a Preconstruction Survey for burrowing owls for acceptance by the applicable jurisdiction</p>	<p>California Department of Fish &amp; Wildlife                       All applicable jurisdictions:                      City of Riverside -- Community &amp; Economic Development Department                      – Planning Division, Building &amp; Safety Division, and Public Works Department</p>
<p><b>MM-BIO-8b. Burrowing Owl Pre-Construction Surveys and Avoidance Measures</b>  <b>Inside of the MSHCP.</b> Approximately 252 acres of the SPA are located within the MSHCP burrowing owl survey area. Prior to ground disturbance or issuance of a grading permit within the MSHCP burrowing owl survey area, a habitat assessment and focused surveys, if suitable habitat is present, shall be completed. All burrowing owl surveys must be conducted in accordance with the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area (RCA 2006). If other methodologies are followed (e.g., CDFG 2012), the Qualified Biologist shall provide further justification regarding why the survey methods implemented yielded optimal results even when the accepted protocol was not followed. Methodology shall be separated into discussions for Step 1 (habitat assessment), Step II-A (focused burrow survey), and Step II-B (focused burrowing owl surveys), as applicable.</p> <p>If burrowing owl are confirmed present on the project site, 90% of those portions of the site that provide for long-term conservation value for the burrowing owl shall be avoided, and equivalency findings shall be made as described in the Section 6.3.2 of the MSHCP as feasible prior to the issuance of a grading permit. If the 90% avoidance threshold cannot be met, then the application must prepare a determination</p>	<p>Thirty days prior to any vegetation removal or ground-disturbance activities or issuance of a grading permit</p>	<p>Submit a Preconstruction Survey for burrowing owls for acceptance by the applicable jurisdiction</p>	<p>California Department of Fish &amp; Wildlife                       All applicable jurisdictions:                      City of Riverside -- Community &amp; Economic Development Department                      – Planning Division, and Building &amp; Safety Division and Public Works Department</p>

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<p>of biological equivalent or superior preservation. (DBESP) document that proposes measures, such as buffers similarly described for areas outside of the MSHCP. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, U.S. Fish and Wildlife Service (USFWS), and CDFW as described in Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future California Environmental Quality Act document approvals. Additionally, the applicant would be required to prepare a Burrowing Owl Protection and Relocation Plan. This plan would need to be coordinated with, and reviewed and approved by the USFWS and CDFW, including the state banding permit office and federal Migratory Bird Treaty Act office if active relocation is needed, prior to initiating any site-disturbing activities. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p> <p><b>Pre-Construction Survey:</b> Within all 252 acres of the SPA located within the MSHCP burrowing owl survey area, regardless of survey results, a pre-construction survey shall be conducted for burrowing owl in accordance with the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area (RCA 2006). In accordance with these instructions, this survey would occur within 30 days prior to ground-disturbance activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, grading, equipment staging.). A minimum of one survey site visit within the described time frame prior to any site disturbance (e.g., vegetation clearing and grubbing, tree removal, site watering, equipment staging, grading) is required to confirm presence or absence of owls on the site. Pre-construction surveys shall be conducted by a qualified biologist. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl have not colonized the site since it was last disturbed. If burrowing owl are found, the same coordination described above will be necessary. If burrowing owl are present within the survey area, take of owls and active nests shall be avoided as determined by a qualified biologist.</p>			
<p><b>MM-BIO-9: Special-Status Wildlife Habitat Assessment, Pre-construction Sweep, and Monitoring</b></p> <p><b>Habitat Assessment.</b> Prior to ground disturbance or issuance of a grading permit on undeveloped sites outside of the Western Riverside County Multiple Species Conservation Plan (MSHCP) within the Northside Specific Plan, a habitat assessment for the potential for special-status wildlife to occur shall be conducted by a Qualified Biologist. If there is suitable habitat for special-status wildlife, then the project grading plan shall list, and the applicant shall implement the following pre-construction sweep and monitoring measures to minimize or avoid impacts to special-status wildlife species.</p> <p><b>Pre-Construction Sweep.</b> Prior to ground disturbance or initiation of clearing, grading or construction, a Qualified Biologist shall conduct a daily pre-construction survey sweep within areas of suitable habitat for special-status species wildlife. The Qualified Biologist shall look for special-status species that may be located within or immediately adjacent to (within 500 feet of) the project work areas, as permitted by access. Any individual special-status wildlife species observed within the project work areas during the pre-construction survey will be flushed or moved out of harm's way to avoid direct impacts to these species. If a population of special-status wildlife are observed during the pre-construction survey and cannot be avoided by the project, additional measures may be required as determined through consultation with the California Department of Fish and Wildlife (CDFW). Additional measures may include seasonal restrictions (e.g., if burrowing owl nesting burrows are identified and cannot be avoided), relocation of the species, and/or compensatory habitat-based mitigation at a minimum 1:1 ratio for the loss of occupied habitat (in which the open space areas to remain post-construction could be counted toward the overall compensatory mitigation requirements, as applicable).</p> <p><b>Monitoring.</b> A Qualified Biologist shall be present to monitor vegetation removal and topsoil salvaging and stockpiling immediately adjacent to or within suitable habitat. The Qualified Biologist shall possess an appropriate California scientific collecting permit to handle special-status species likely to occur in the project area. If special-status wildlife species are detected in the work area during the monitoring effort, the authorized Qualified Biologist will capture and relocate individuals to nearby undisturbed areas with suitable habitat outside of the construction area, but as close to their origin as possible. All special-status wildlife moved or flushed during project activities will be documented by the biologist on site and provided to San Bernardino and Riverside Counties and/or CDFW upon completion of construction and prior to the issuance of occupancy permits.</p>	<p>Prior to ground disturbance, or issuance of a grading permit.</p>	<p>Submit a Preconstruction Survey for special-status species wildlife for acceptance by the applicable jurisdiction</p>	<p>California Department of Fish &amp; Wildlife Qualified Biologist  All applicable jurisdictions: City of Riverside -- Community &amp; Economic Development Department -- Planning Division, and Building &amp; Safety Division and Public Works Department</p>
<p><b>MM-BIO-10: Least Bell's Vireo, Southwestern Willow Flycatcher, and Western Yellow-Billed Cuckoo Habitat Assessment, Focused Surveys and Mitigation</b></p> <p><b>Inside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).</b> Prior to ground disturbance or issuance of a grading permit on undeveloped sites inside the MSHCP within the Northside Specific Plan, a habitat assessment for suitable habitat for least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo shall be completed by a Qualified Biologist for the project site and a 500-foot buffer area. If a project site and surrounding 500-foot buffer are evaluated to have suitable habitat (nesting and/or foraging) for these riparian bird species, then protocol-level focused surveys are required prior to the issuance of a grading permit; if the habitat will not be avoided. Surveys should be conducted according to accepted U.S. Fish and Wildlife Service (USFWS) protocols specific</p>	<p>Prior to ground disturbance or issuance of a grading permit (Refer to mitigation measure for breeding season)</p>	<p>Submit a Habitat Assessment for least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo for acceptance by the applicable jurisdiction</p>	<p>United States Fish &amp; Wildlife Service California Department of Fish &amp; Wildlife Qualified Biologist</p>

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<p>for each species (least Bell's vireo—USFWS 2001; southwestern willow flycatcher—USFWS 2000b; western yellow-billed cuckoo—USFWS 2015). If any of these riparian birds are confirmed present within 500 feet of the project site inside of the MSHCP, then the project grading plan shall list and the applicant shall implement the following measures to minimize or avoid impacts to least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.</p> <p>The project grading and construction activities shall avoid the breeding season for whichever riparian bird species is/are present on or within 500 feet of the project: April through July for least Bell's vireo, May through July for southwestern willow flycatcher, and June through August for western yellow-billed cuckoo, as feasible. If the breeding season cannot be avoided, then additional measures determined by a Qualified Biologist in consultation with the applicable jurisdiction shall be implemented to ensure that no indirect take occurs. Specifically, project equipment that results in noise levels above 60 decibels (dB) shall be fitted with sound dampeners or equivalent noise reduction measures shall be completed to reduce noise to below 60 dB at breeding habitat. On-site noise monitoring shall also be required to ensure that project-related activities do not result in average noise levels increasing above 60 dB at riparian bird breeding habitat during the breeding season. If any project activities exceed 60 dB, or the on-site monitor determines project activities are resulting in harassment, which could cause nest failure, the monitor would have the authority to halt activities until additional measures (such as a sound wall) can be implemented. Additionally, if any of these riparian birds are confirmed present on the project site, 90% of those portions of the site that provide for long-term conservation value for these species shall be avoided. If the 90% avoidance threshold cannot be met, the applicant must prepare a determination of biological equivalent or superior preservation (DBESP) document for these riparian birds that would include preservation, enhancement, re-establishment, and/or establishment of suitable riparian habitat at a 3:1 ratio. The DBESP shall include an analysis that demonstrates the lost functions and values of the impact will be replaced by the proposed measures. The DBESP shall be reviewed and approved by the City of Riverside or County of Riverside, USFWS, and California Department of Fish and Wildlife as described in the Section 6.1.2 of the MSHCP prior to the issuance of a grading permit or, as applicable, any future CEQA document approvals. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p>		<p>Submit Protocol-Level Focused Surveys may be required</p> <p>Submit Nesting Bird Survey for acceptance by the applicable jurisdiction</p>	<p>All applicable jurisdictions: City of Riverside - - Community &amp; Economic Development Department - Planning Division, and Building &amp; Safety Division and Public Works Department</p>
<p><b>MM-BIO-11a: Sensitive Vegetation Communities</b></p> <p><b>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</b> Prior to ground disturbance or issuance of a grading permit on undeveloped sites outside the MSHCP within the Northside Specific Plan City of Colton area, a Qualified Biologist shall conduct vegetation mapping within the proposed project site. The Qualified Biologist will determine if there is a sensitive natural community per the California Department of Fish and Wildlife (CDFW 2019) present on site, if there is a sensitive natural community on site, and the community cannot be avoided, the impact must be mitigated at not less than a 1:1 ratio through conservation of the same vegetation community either on site, off site, or through an approved mitigation bank. The mitigation site shall be fenced and preserved. If on-site preservation occurs, non-native plant species listed on the most recent California Invasive Plant Council inventory (<a href="https://www.cal-ipc.org/plants/inventory/">https://www.cal-ipc.org/plants/inventory/</a>) with a rating of moderate or high shall not be included in proposed landscaping. A sensitive habitat mitigation proposal will be provided by the applicant via a Qualified Biologist and approved by the City of Colton prior to the issuance of a grading permit. The sensitive habitat mitigation plan shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p>	<p>Prior to any vegetation removal, ground disturbance or issuance of a grading permit.</p>	<p>Submit a Sensitive Habitat Mitigation Plan for acceptance by the City of Colton</p>	<p>California Department of Fish &amp; Wildlife Qualified Biologist City of Colton</p>
<p><b>MM-BIO-11b: Sensitive Vegetation Communities</b></p> <p><b>Inside of the MSHCP:</b> For future development in the Specific Plan Area inside of the MSHCP, no mitigation is required for impacts to sensitive natural communities other than those defined in Section 6.1.2 (riparian/riverine and vernal pools) of the MSHCP, which are addressed in <b>MM-BIO-6</b> and <b>MM-BIO-12</b>.</p>	<p>Prior to any vegetation removal or issuance of a grading permit. Refer to MM-BIO-12</p>	<p>Refer to MM-BIO-12</p>	<p>All applicable jurisdictions: City of Riverside - - Community &amp; Economic Development Department - Planning Division, and Building &amp; Safety Division and Public Works Department County of Riverside</p>
<p><b>MM-BIO-12: Jurisdictional Waters and Riparian/Riverine</b></p> <p>Prior to ground disturbance or issuance of a grading permit on undeveloped land within the Northside Specific Plan, a Qualified Biologist shall assess the site to determine if there is potential for U.S. Army Corps of Engineers (ACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB) jurisdictional waters of the United States/state on the project site. If the project is in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), the Qualified Biologist will also map any riparian/riverine resources that occur on the site and surrounding vicinity. If there is potential for these resources to occur, a formal delineation of these resources shall be conducted in accordance with each agency's requirements, guidance, and standards prior to</p>	<p>Prior to ground disturbance within jurisdictional areas or issuance of a grading permit.</p>	<p>Provide evidence of issuance of regulatory permits related to impacts to jurisdictional waters</p>	<p>California Department of Fish &amp; Wildlife United States Fish &amp; Wildlife Service</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p>issuance of a grading permit. If there are jurisdictional waters located on a project site, then the project grading plan shall identify and the applicant shall implement the following jurisdictional waters measures prior to the issuance of a grading permit.</p> <p>If avoidance of impacts to potentially jurisdictional areas is not practicable, then the project applicant shall obtain the applicable permits to impact these resources, such as a 404 permit from ACOE, a Streambed Alteration Agreement from CDFW, and a 401 Water Quality Certification from the RWQCB as described in Northside Specific Plan Program Environmental Impact Report <b>CMHYD-1</b>. Final mitigation requirements for the impact shall be established by these agencies, and a final wetlands/waters mitigation plan shall be prepared prior to issuance of a grading permit. However, at a minimum, the following requirements shall be met:</p> <ol style="list-style-type: none"> <li>1. All temporary impacts to jurisdictional waters will be restored on site. Restoration will include recontouring and erosion control with a native seed mix. Prior to seeding temporary ground disturbance areas, the Qualified Biologist will review the seeding palette to ensure that no seeding of invasive plant species, as identified in the most recent version of the California Invasive Plant Inventory for the region, will occur, and that the mix is appropriate for the area.</li> <li>2. Compensatory mitigation for permanent impacts to jurisdictional waters shall occur at no less than 1:1 ratio for the impacts to jurisdictional waters. A waters mitigation and monitoring plan shall be prepared that outlines the compensatory mitigation in coordination with the ACOE, CDFW, and RWQCB. Mitigation shall include creation, enhancement, and/or restoration, and will be either completed on site or off site. The mitigation program shall be designed to replace the functions and values of the jurisdictional resources impacted, with requirements to achieve specific success criteria. The mitigation areas shall be designed to have similar vegetative characteristics (excluding exotic species) to those of the affected areas. If creation is provided, the site shall be designed to emulate the density and structure of the affected areas once the establishment areas have met the mitigation success criteria. As applicable, the qualified biologist shall determine the appropriate planting and seeding palettes.</li> </ol> <p>In addition to the requirements above for all future projects in the Specific Plan Area, projects within the MSHCP must prepare a determination of biologically equivalent or superior preservation, reviewed and approved by the City of Riverside or the County of Riverside, USFWS, and CDFW, to ensure replacement of any lost functions and values of riparian/riverine habitat as it related to covered species prior to the issuance of a grading permit; refer to MSHCP Section 6.1.2 for more information.</p> <p>Additionally, if a jurisdictional water of the United States/State is avoided by the project, the grading and construction plans shall identify that waters will be fenced off where humans can enter the site prior to the issuance of a grading or construction permit. If on-site avoidance occurs, it shall be verified prior to the issuance of a construction permit that non-native plant species listed on the most recent California Invasive Plant Council inventory (<a href="https://www.cal-ipc.org/plants/inventory/">https://www.cal-ipc.org/plants/inventory/</a>) with a rating of moderate or high shall not be included in landscaping.</p>			<p>United States Army Corps of Engineers</p> <p>Santa Ana Regional Water Quality Control Board</p> <p>Biological monitor</p> <p>Construction Superintendent</p> <p>All applicable jurisdictions:                      City of Riverside – Community &amp; Economic Development Department                      – Planning Division and Public Works Department</p> <p>County of Riverside</p>
<p><b>MM-BIO-13: Nesting Bird Surveys</b></p> <p>Prior to ground disturbance or issuance of a grading or construction permit on undeveloped sites or sites within 500 feet of undeveloped areas, the grading plans and construction plans shall state the following nesting bird requirements.</p> <p>A Qualified Biologist shall conduct pre-construction surveys no earlier than 14 days prior to any on-site grading and construction that may occur during the nesting/breeding season of special-status bird species. Pre-construction nesting bird surveys shall also need cover a 500-foot buffer around the site. The pre-construction surveys shall be conducted between March 1 and September 1, or as determined by the Qualified Biologist.</p> <p>If occupied nests are found, then limits of construction to avoid occupied nests shall be established by the Qualified Biologist in the field with flagging, fencing, or other appropriate barriers (e.g., 250 feet around active passerine nests to 500 feet around active non-listed raptor nests), and construction personnel shall be instructed on the sensitivity of nest areas. The Qualified Biologist shall serve as a construction monitor during those periods when construction activities are to occur near active nest areas to avoid inadvertent impacts to these nests. The Qualified Biologist may adjust the 250-foot or 500-foot setback at his or her discretion depending on the species and the location of the nest (e.g., if the nest is well protected in an area buffered by dense vegetation). Once the Qualified Biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, construction may proceed in the setback areas. If nesting raptors or migratory birds are not detected during the pre-construction survey, no further measures shall be required, and construction activities may proceed.</p>	<p>Prior to ground disturbance or issuance of a grading or construction permit, require survey 14-days prior to construction (Refer to Mitigation Measure for breeding season)</p>	<p>Submit Nesting Bird Survey for acceptance by the applicable jurisdiction</p>	<p>All applicable jurisdictions:                      City of Riverside – Community &amp; Economic Development Department                      – Planning Division, Building &amp; Safety Division, and Public Works Department</p> <p>County of Riverside</p>

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>MM-BIO-14a: Delhi Sands Flower-Loving Fly</b></p> <p><i>Outside of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP):</i> Delhi Sands flower-loving fly is not expected to occur outside of the MSHCP. There are no mapped Delhi Sands outside of the MSHCP in the City of Colton. Thus, no Delhi Sands flower-loving fly mitigation is required for future projects in the Northside Specific Plan outside of the MSHCP.</p>	n/a	n/a	n/a
<p><b>MM-BIO-14b: Delhi Sands Flower-Loving Fly</b></p> <p><i>Inside of the MSHCP:</i> Prior to ground disturbance or issuance of a grading or construction permit on in areas containing open Delhi Sands (mapped per the MSHCP), 2 years of focused surveys for the Delhi Sands flower-loving fly shall be conducted by a Qualified Biologist. Surveys shall be conducted according to the accepted U.S. Fish and Wildlife Service (USFWS) protocol (2004); surveys shall be conducted two times per week from July 1 to September 20 for 2 consecutive years under suitable conditions. Areas that are 100% developed do not require focused surveys or further measures, but this assessment must be documented and provided to the applicable MSHCP Permittee (i.e., City of Riverside or County of Riverside). If Delhi Sands flower-loving fly are confirmed to be present on a project site, then the project grading plan shall identify, and the applicant shall implement the following Delhi Sands flower-loving fly measures prior to the issuance of a grading permit.</p> <p>Based on the Qualified Biologist surveys for Delhi Sands flower-loving fly, 90% of those portions of the site that provide for long-term conservation value for the species shall be avoided, and equivalency findings shall be made. If the 90% avoidance threshold cannot be met, then the applicant must prepare a determination of biological equivalent or superior preservation (DBESP) document for Delhi Sands flower-loving fly to be reviewed and approved by the City of Riverside or County of Riverside, and USFWS prior to the issuance of a grading permit or, as applicable, any future California Environmental Quality Act document approvals. The DBESP shall include an analysis that demonstrates the best functions and values of the impact will be replaced by the proposed measures. More specifically, the applicant shall mitigate the loss of mapped Delhi Soils (or occupied habitat) at a minimum of 1:1 ratio through the purchase of credits from the Colton Dunes Conservation Bank or other Wildlife Agency-approved conservation bank. Once the DBESP is approved and prior to grading or construction permit issuance, the DBESP measures shall be incorporated into the grading and construction plans and conditions of approval, as applicable.</p>	Prior to ground disturbance or issuance of a grading or construction permit on in areas containing open Delhi Sands (Refer to the Mitigation Measure for breeding season).	Conduct two years of focused surveys for the Delhi Sands flower-loving fly for acceptance by the applicable jurisdiction	United States Fish & Wildlife Service California Department of Fish & Wildlife Qualified Biologist All applicable jurisdictions: City of Riverside – Community & Economic Development Department – Planning Division, and Building & Safety Division and Public Works Department County of Riverside
<b>Cultural Resources</b>			
<b>Compliance Measures</b>			
<p><b>CM-CUL-1</b></p> <p><b>Inadvertent Discovery of Human Remains.</b> Prior to issuance of any grading permit within the Northside Specific Plan, the applicable jurisdiction (City of Riverside, City of Colton or County of Riverside) shall verify the grading plan states the following:</p> <p>In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the applicable County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.</p>	Prior to issuance of grading permit.	Approval of grading permit	All applicable jurisdictions: City of Riverside – Community & Economic Development Department – Planning Division, HPO, and Public Works Department City of Colton or County of Riverside
Mitigation Measures			
<p><b>MM-CUL-1: Identification and Protection of Historical Resources</b></p> <p>Prior to issuance of any demolition, grading, or building permit for projects within the Northside Specific Plan, the City Historic Preservation Officer or Qualified Designees of the applicable jurisdiction shall determine if a historic built environment resource (e.g., buildings, structures, and objects) over 45 years of age has potential to be affected by the proposed demolition activities. If a potential historic resource is identified, a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61.1) shall record and evaluate any properties over 45 years old that have not been previously evaluated, or require evaluation updates due to the passage of time or changes to baseline conditions. The qualified professional will: (1) review current California Historical Resources Information System (CHRIS) records search and Historic Resources Inventory (HRI) data to ensure that previously recorded resources are identified; (2) survey the project site for potential historical resources and document the resource(s)</p>	Prior to issuance of any demolition, grading, or building permit.	Submit evaluation of properties over 45 years old, prepared by a qualified architectural historian, if determined to be historic and not previously evaluated. Provide evaluation updates as specified in the mitigation measure.	Qualified Architectural Historian All applicable jurisdictions: City of Riverside – Community & Economic Development Department – Planning Division, HPO, Building & Safety Division, and Public Works Department

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p>with notes and photographs; (3) record and evaluate any potential resources, including completion of adequate background and archival research on applicable properties, establishment of an appropriate historic context, application of state and local designation criteria, and preparation of the appropriate set of State of California Department of Parks and Recreation Series 523 Forms (DPR forms); and (4) conduct an assessment of potential impacts to any identified historical resources in consideration of project-related activities that may result in substantial adverse change to the significance of an historical resource. Based on this impacts assessment and consistent with the applicable City of Colton Municipal Code Chapter 15.40 Historic Preservation and City of Riverside Municipal Code Chapter 20, as applicable, the City shall commit to avoiding historical resources or ensuring that all project-related activities with the potential to impact historic resources are in conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (NPS 2017) to the extent feasible.</p>			<p>City of Colton or County of Riverside</p>
<p><b>MM-CUL-2: Trujillo Adobe Historic Preservation</b></p> <p>Prior to issuance of any demolition, building or grading permit related to the Trujillo Adobe or its immediate surroundings, the City of Colton shall ensure the applicant has retained the services of qualified historic preservation specialists to assist with additional analysis, documentation, project design review, and consultation with key local stakeholders in consideration of the proposed Trujillo Adobe restoration. The following steps shall be implemented prior to issuance of permits related to the Trujillo Adobe or adjacent properties:</p> <ul style="list-style-type: none"> <li>• <b>Establish a Required Study Boundary.</b> The Cities of Riverside and Colton shall establish a study boundary around the Trujillo Adobe that triggers consideration of the adobe in projects that fall within the established boundary. When establishing the boundary, it is important to consider potential indirect effects from vibration and visual intrusions to the resource's setting. Prior to implementation of any project within the established study boundary, the applicant shall retain a qualified historic preservation specialist to assess the potential for indirect impacts to the adobe as a result of adjacent construction activities, including the potential for groundborne vibration and visual intrusions.</li> <li>• <b>Updated Significance Evaluation.</b> The applicant shall retain a qualified architectural historian to prepare a detailed historical significance evaluation for the Trujillo Adobe in consideration of existing conditions as well as previously prepared resource documentation. The evaluation shall include a detailed historic context statement for the adobe that is developed through archival research. This evaluation should identify the specific features of the Trujillo Adobe that contribute to the resource's historical significance, including its setting, paths of circulation, materials, and related features and spaces. Likewise, the report shall identify features that do not contribute to the resource's historical significance or fall outside the Trujillo Adobe's period of significance (which must be clearly defined in the evaluation). The Trujillo Adobe shall be evaluated in consideration of City, County, California Register of Historical Resources, and National Register of Historic Places designation criteria and integrity requirements. Detailed photographs of the interior, exterior, and setting shall be included as part of the evaluation. If warranted, the report shall include recommendations for additional archival-level documentation prior to project implementation. The significance evaluation shall be subject to the approval of the City Historic Preservation Officer or Qualified Designees.</li> <li>• <b>Project Plan Development.</b> The applicant shall retain a qualified historic preservation architect/engineer (ideally with experience in adobe restoration) to assist in the development of the proposed restoration plans. These professionals may recommend preparation of additional studies in order to fully understand project-specific constraints. Development of the proposed project plans will consider the findings and recommendations of the updated significance evaluation with regard to retention of important character-defining features, historic materials, and historical connections; and will also consider feedback from local stakeholders with a vested interest in the Trujillo Adobe and its future. The project plan shall be subject to the approval of the City Historic Preservation Officer or Qualified Designees.</li> <li>• <b>Project Plan Review.</b> The applicant shall retain a qualified architectural historian to review the proposed design plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The architectural historian shall provide feedback in the form of a conformance review memorandum that provides an assessment of how the project meets the Standards, or likewise, does not meet the Standards. Based on this feedback, the applicant shall make adjustments (as warranted) to existing project plans in order to be in conformance with the Standards and avoid impacts to historical resources.</li> <li>• <b>Development of a Protection Plan.</b> Upon finalization of proposed project design plans, the applicant shall work with historic preservation professionals to develop a protection plan for the Trujillo Adobe and any associated historical resources. The plan should detail methods for protecting the adobe and its important historical features from inadvertent damage during construction-related activities, in consideration of adjacent construction and stabilization of the adobe building. Issues to consider include impacts resulting from vibration, dust and debris, and heavy machinery. The plan should also detail specific protection/safety measures for working in and around historic adobe structures. The protection plan shall be subject to the approval of the City Historic Preservation Officer or Qualified Designees.</li> </ul>	<p>Prior to issuance of any demolition, building or grading permit related to the Trujillo Adobe or its immediate surroundings.</p>	<p>Approval of plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties</p> <p>Submit a study boundary around the Trujillo Adobe, prepared by a qualified historic preservation specialist</p> <p>Submit a detailed historical significance evaluation for the Trujillo Adobe</p> <p>Develop a protection plan for the Trujillo Adobe and any associated historical resources</p>	<p>Qualified Architectural Historian</p> <p>Qualified Historic Preservation Specialist</p> <p>Qualified Historic Preservation Architect/Engineer</p> <p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department – Planning Division and HPO</p> <p>City of Colton</p>

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>MM-CUL-3a: On-call Project Archaeologist</b></p> <p>Prior to the issuance of a grading permit for projects that would excavate previously undisturbed soils, the Property Owner/Developer shall provide a letter from a certified archaeologist and paleontologist stating that the Property Owner/Developer has retained these individuals as needed, and that the archaeologist shall be on call during all grading and other significant ground-disturbing activities in native sediments and a paleontologist shall be on call during excavations over 1,000 cubic yards within native sediments that have a high potential to yield significant fossils (see EIR Figure 3.6-2) .</p>	<p>Prior to the issuance of a grading permit.</p>	<p>Provide a letter for the retention of a certified archaeologist and paleontologist</p>	<p>Certified Archaeologist and Paleontologist</p> <p>All applicable jurisdictions:                      City of Riverside – Community &amp; Economic Development Department – Planning Division and HPO</p> <p>City of Colton or County of Riverside</p>
<p><b>MM-CUL-3b: Treatment and Disposition of Cultural Resources</b></p> <p>In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> <li><b>Consulting Tribes Notified:</b> Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the City of Riverside Community &amp; Economic Development Department or applicable jurisdiction evidence of notification to consulting tribes. Consulting tribes will be allowed access to the discovery, in order to assist with the significance evaluation. Consulting tribes(s) will be allowed access to the discovery, in order to assist with the significance evaluation.</li> <li><b>Temporary Curation and Storage:</b> During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with any tribal monitor providing oversight of the process.</li> <li><b>Treatment and Final Disposition:</b> The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains, as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community &amp; Economic Development Department or applicable jurisdiction with evidence of same:                         <ol style="list-style-type: none"> <li>Accommodate the process for on-site reburial of the discovered items with any consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed.</li> <li>A curation agreement with an appropriate qualified repository within Riverside County or San Bernardino County, as applicable, that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.</li> <li>If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default.</li> <li>At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the applicable jurisdiction documenting monitoring activities conducted by the project archaeologist and any Native American Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the applicable jurisdiction, Eastern Information Center, and interested tribes.</li> </ol> </li> </ol>	<p>During grading and construction</p>	<p>Provide evidence of notification to consulting tribes</p> <p>Report prepared that documents the finding and disposition of any Native American cultural resources</p> <p>Provide a copy of the curation agreement if resources are found and curated</p> <p>Provide a copy of the completed Phase IV Monitoring Report</p>	<p>Qualified Archeological Monitor</p> <p>All applicable jurisdictions:                      City of Riverside – Community &amp; Economic Development Department – Planning Division and HPO</p> <p>City of Colton or County of Riverside</p>
<p><b>MM-CUL-3c: Cultural Sensitivity Training</b></p> <p>The Secretary of Interior Standards certified archaeologist and any Native American Tribal Monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.</p>	<p>Prior to grading</p>	<p>Provide a copy of the completed Phase IV Monitoring Report</p>	<p>Qualified Archeological Monitor, and Native American Monitor</p> <p>All applicable jurisdictions:                      City of Riverside – Community &amp; Economic Development Department – Planning Division and HPO</p> <p>City of Colton or County of Riverside</p>

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>MM-CUL-4: Identification and Protection of Archaeological Resources</b></p> <p>Prior to issuance of any grading permit for project within the Northside Specific Plan, the applicable jurisdiction (City of Riverside, City of Colton, or County of Riverside) shall ensure that archaeological resources are identified and appropriately treated. This includes recordation and evaluation of any previously unevaluated archaeological resources. A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, shall record and evaluate archaeological resources that have not been previously evaluated, or require evaluation updates due to the passage of time or changes to site conditions; this mitigation measure also applies to any archaeological resource discovered as a result of project ground-disturbance activities. The qualified professional will: (1) review current CHRIS records search to ensure that previously recorded resources are identified; (2) survey the project site for potential archaeological resources and document the resource(s) with notes and photographs; (3) record and evaluate any potential archaeological resources and apply state and local designation criteria, and preparation of the appropriate set of State of California Department of Parks and Recreation Series 523 Forms (DPR forms); and (4) conduct an assessment of potential impacts to any identified archaeological resources in consideration of project-related activities that may result in substantial adverse change to the significance of an archaeological resource. Significance shall be assessed based on California Environmental Quality Act (CEQA) Section 15064.5 criteria. If a significant resource is identified, avoidance or minimization of the of the resource shall be completed consistent with the applicable CEQA Section 21083.2. City of Colton Municipal Code Chapter 15.40 Historic Preservation and City of Riverside Municipal Code Chapter 20, as feasible. If the discovery proves significant and avoidance is not possible, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted. Resources found not to be significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate DPR forms and inclusion of results in the survey and/or assessment report.</p>	<p>Prior to issuance of grading permit.</p>	<p>Submit recordation and evaluation of any previously unevaluated archaeological resources</p> <p>Complete avoidance or minimization of the of the resource if a significant resource is identified, consistent with the applicable CEQA Section 21083.2</p>	<p>Qualified Archaeologist</p> <p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department – Planning Division and HPO</p> <p>City of Colton or County of Riverside</p>
<b>Geology and Soils</b>			
<b>Compliance Measures</b>			
<p><b>CM-GEO-1</b></p>	<p>Prior to the issuance of building permit.</p>	<p>Approval of Construction drawings</p>	<p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department – Building &amp; Safety Division</p> <p>City of Colton or County of Riverside</p>
<p>Prior to the issuance of any building permit, it shall be confirmed that future building plans shall be prepared in accordance with the California Building Code, including (but are not limited to) the requirements for foundation and soil investigations (Sections 1803 and 1803A); excavation, grading, and fill (Sections 1804 and 1804A); damp-proofing and water-proofing (Sections 1805 and 1805A); allowable load-bearing values of soils (Sections 1806 and 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Sections 1807 and 1807A), and foundations (Sections 1808 and 1808A); and design of shallow foundations (Sections 1809 and 1809A) and deep foundations (Sections 1810 and 1810A). Future building plans shall also specifically confirm to the California Green Building Standards Code standards.</p>	<p>Prior to the issuance of building permit.</p>	<p>Approval of Construction drawings</p>	<p>City of Riverside – Community &amp; Economic Development Department – Building &amp; Safety Division</p>
<p><b>CM-GEO-1a</b></p>	<p>Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the City of Riverside Building Code.</p>	<p>Approval of Construction drawings</p>	<p>City of Riverside – Community &amp; Economic Development Department – Building &amp; Safety Division</p>
<p><b>CM-GEO-1b</b></p>	<p>Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the City of Colton Building Code.</p>	<p>Approval of Construction drawings</p>	<p>City of Colton</p>
<p><b>CM-GEO-1c</b></p>	<p>Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the County of Riverside Building Code.</p>	<p>Approval of Construction drawings</p>	<p>County of Riverside</p>
<p><b>CM-GEO-2a</b></p>	<p>Prior to the issuance of any grading permit, it shall be confirmed that grading plans shall be prepared in accordance with the City of Riverside Municipal Code, including Riverside Municipal Code Title 17 and 18 pertaining to grading requirements. In addition, grading shall adhere to the City's General Plan 2025 Public Safety Element Objectives PS1.1, 1.2, and 1.4.</p>	<p>Approval of Grading Plan</p>	<p>City of Riverside – Community &amp; Economic Development Department – Planning Division and Building &amp; Safety Division</p>
<p><b>CM-GEO-2b</b></p>	<p>Prior to the issuance of any grading permit, it shall be confirmed that grading plans shall be prepared in accordance with the City of Colton Municipal Code Chapter 16.72, Grading and Erosion Control. In addition, grading shall adhere to the City of Colton General Plan Safety Element policies related to inspections of building sites related to geologic concerns.</p>	<p>Approval of Grading Plan</p>	<p>City of Colton</p>

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>CM-GEO-2c</b></p> <p>Prior to the issuance of any grading permit, it shall be confirmed that grading plans shall be prepared in accordance with the County of Riverside Municipal Code, Fault Ordinance, and General Plan Safety Element policies S 2.1 to 2.7 and S 3.1 to 3.8.</p>	<p>Prior to the issuance of grading permit.</p>	<p>Approval of Grading Plan</p>	<p>County of Riverside</p>
<p><b>Mitigation Measures</b></p>			
<p><b>MM-GEO-1</b></p>			
<p>Prior to issuance of a grading permit for projects within areas identified with a high paleontological sensitivity (older Quaternary alluvial deposits), a Qualified Paleontologist shall be retained per the Society of Vertebrate Paleontology guidelines (SVP 2010). The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the Society of Vertebrate Paleontology guidelines and shall outline requirements for pre-construction meeting attendance and worker environmental awareness training, where monitoring is required within the Northside Specific Plan area based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The Qualified Paleontologist shall attend the pre-construction meeting, and a paleontological monitor shall be on site during rough grading and other ground-disturbing activities in previously undisturbed, fine-grained older Quaternary alluvial deposits. These deposits may be encountered at shallow depths below the surface. Within developed areas of Northside Specific Plan area, this depth is assumed to be at least 5 feet below the ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot-radius buffer. Once documentation and collection of the find is completed pursuant to the PRIMP and the Society of Vertebrate Paleontology guidelines, the monitor shall allow grading to recommence in the area of the find. Curation and storage of salvaged specimens in an approved repository institution shall be completed for all significant resources discovered and collected.</p>	<p>Prior to ground disturbance or issuance of a grading permit within areas identified with a high paleontological sensitivity.</p>	<p>Submit a Paleontological Resources Impact Mitigation Program (PRIMP) for the project.</p>	<p>Qualified Paleontologist Paleontological Monitor  All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department – Planning Division and HPO  City of Colton or County of Riverside</p>
<p><b>Hazards and Hazardous Materials</b></p>			
<p><b>Compliance Measures</b></p>			
<p><b>CM-HAZ-1</b></p>			
<p>All businesses shall comply with a California Health and Safety Code (HSC), Division 20, Chapter 6.95, Sections 25500 – 25520, and shall prepare and implement a hazardous materials business plan in coordination with the appropriate Certified Unified Program Agency.</p>	<p>Prior to opening of businesses within the Northside Specific Plan.</p>	<p>Approval of Construction Drawings</p>	<p>All applicable jurisdictions: City of Riverside – Fire Department  City of Colton or County of Riverside</p>
<p><b>CM-HAZ-2</b></p>			
<p>The transport of hazardous materials shall be in compliance with Title 13 CCR, Division 2, Chapter 6 of the California Highway Patrol, which requires safety measures and labels to identify and safely transport hazardous materials.</p>	<p>Prior to transport of any hazardous materials</p>	<p>Approval by Police Department</p>	<p>All applicable jurisdictions: City of Riverside – Police Department  City of Colton or County of Riverside</p>
<p><b>CM-HAZ-3</b></p>			
<p>Prior to the issuance of any demolition permit of a structure built before 1978, lead-based paint (LBP) testing shall be completed to determine if any surface coatings contain lead equal to or greater than 1.0 milligram per square centimeter of surface area, or 0.5 percent by weight or 5,000 parts per million by weight, as defined by the USEPA mandating licensed abatement actions. If testing identifies the presence of LBP above these thresholds, then activities shall follow applicable sections in OSHA 29 CFR 1910.1025, 29 CFR 1926.62, the EPA Renovation, Repair and Painting (RRP) Rule and the SI Construction Specification Section 028300, "Work Activities Impacting Lead Containing Materials". Requirements outlined in HUD 24 CFR Part 35 Lead Safe Housing Rule shall apply for activities conducted in residential housing. Abatement and interim control work that disturbs LBP on more than 2 square feet of interior surface, 20 square feet on exterior surfaces, or 10 percent of the total surface area on an interior or exterior type of component with a small surface area shall be completed by a certified and licensed lead abatement contractor.</p>	<p>Prior to the issuance of any demolition permit of a structure built before 1978.</p>	<p>Approval by Riverside County Health Department</p>	<p>Riverside County Health Department  City of Colton or County of Riverside</p>
<p><b>CM-HAZ-4</b></p>			
<p>Prior to the issuance of any demolition permit of a structure built before 1989, asbestos-containing material (ACM) testing shall be completed to determine if asbestos is present at a rate over 1 percent. If ACMs are present, then activities shall be required to comply with the Environmental Protection Agency Asbestos Worker Protection Rule (40 CFR Part 763, Subpart G), and Asbestos National Emission</p>	<p>Prior to the issuance of any demolition permit of a structure was built before 1989.</p>	<p>AQMD Asbestos and Demolition Notification</p>	<p>Air Quality Management District (AQMD)  All applicable jurisdictions:</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p>Standard for Hazardous Air Pollutants (NESHAP) Regulations (40 CFR Part 61, Subpart M), as well as Occupational Safety and Health Administration general regulations regarding asbestos (29 CFR 1910.1001) and construction standards (29 CFR 1926.1101).</p>			<p>City of Riverside -- Community &amp; Economic Development Department – Building &amp; Safety Division</p> <p>City of Colton or County of Riverside</p>
<p><b>CM-HAZ-5</b></p> <p>Prior to the issuance of any building permit or site entitlements for future development occurring within designated Zone E or Airspace Protection Surfaces for the March Air Reserve Base, the City of Riverside shall review and ensure consistency with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.</p>	<p>Prior to the issuance of any building permit or development entitlements within designated Zone E of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.</p>	<p>Compatibility Determination by the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.</p>	<p>City of Riverside -- Community &amp; Economic Development Department – Planning Division</p>
<p><b>Mitigation Measures</b></p>			
<p><b>MM-HAZ-1</b></p> <p>Prior to the issuance of a grading or demolition permit for a site undergoing active remediation and environmental monitoring, the City with land use jurisdiction shall require written confirmation from the overseeing environmental agency to ensure the existing environmental contamination will not impact construction worker health and safety, future occupant health and safety, or future land use either on or nearby the site, or that a remediation plan has been developed and will be implemented in accordance with the overseeing environmental agency to ensure future activities will not exceed established regulatory thresholds for future land use either on or nearby the site.</p>	<p>Prior to the issuance of a grading or demolition permit</p>	<p>Approval of Remediation Plan</p>	<p>Riverside County Environmental Health Department</p> <p>California Environmental Protection Agency</p> <p>Santa Ana Regional Water Quality Control Board</p> <p>All applicable jurisdictions: City of Riverside -- Community &amp; Economic Development Department – Planning Division, Public Works Department, and Fire Department</p> <p>City of Colton or County of Riverside</p>
<p><b>MM-HAZ-2</b></p>			
<p>Prior to the issuance of a grading or demolition permit, sites with previously documented soil, soil vapor, and/or groundwater contamination cases that have been closed shall be reviewed by the City with land use jurisdiction to determine compliance with applicable regulatory standards for exposure limits based on the proposed land use (i.e., residential, commercial, industrial) as well as construction worker safety requirements. The applicant may be required to provide additional data (i.e., samples) and/or a health risk assessment to the City with land use jurisdiction to demonstrate such compliance prior to the issuance of a grading or demolition permit. If remaining contamination levels exceed the exposure limits for the proposed land use or worker safety, the City with land use jurisdiction shall consult the overseeing regulatory agency prior to the issuance of permits to determine an appropriate plan of action for remediation or work plan related to the potential hazards. Any remediation efforts shall ensure that potential hazardous materials are reduced to levels below the established regulatory thresholds, as needed.</p>	<p>Prior to the issuance of a grading or demolition permit</p>	<p>Approval of Remediation Plan</p>	<p>Riverside County Environmental Health Department</p> <p>California Environmental Protection Agency</p> <p>Santa Ana Regional Water Quality Control Board</p> <p>All applicable jurisdictions: City of Riverside -- Community &amp; Economic Development Department – Planning Division, Public Works Department, and Fire Department</p> <p>City of Colton or County of Riverside</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>MM-HAZ-3</b></p> <p>Prior to the issuance of a grading or construction permit within the Pellissier Ranch area (Subarea 1 or 2), the City with land use jurisdiction shall require that surface soil impacts be assessed for future development to determine if residual pesticide contamination has impacted surface soils above applicable risk-based criteria. If levels are found to be above applicable risk-based criteria for future land development or construction worker safety, the City with land use jurisdiction will require additional remedial measures are taken to ensure the contaminated media does not impact human health of construction workers or future occupants, or the environment and future land use in accordance with regulations.</p>	<p>Prior to the issuance of a grading or construction permit within the Pellissier Ranch area (Subarea 1 or 2).</p>	<p>Approval of Remediation Plan</p>	<p>Riverside County Environmental Health Department California Environmental Protection Agency Santa Ana Regional Water Quality Control Board All applicable jurisdictions: City of Riverside -- Community &amp; Economic Development Department - Planning Division, Public Works Department, and Fire Department City of Colton or County of Riverside</p>
<p><b>Hydrology and Water Quality</b></p>			
<p><b>Compliance Measures</b></p>			
<p><b>CM-HYD-1</b></p>	<p>Prior to the issuance of a grading permit</p>	<p>Prepare a Stormwater Pollution Prevention Plan for projects over one acre</p>	<p>All applicable jurisdictions: City of Riverside – Public Works Department City of Colton or County of Riverside</p>
<p><b>CM-HYD-2a</b></p> <p>Prior to approval of development entitlements for priority projects as defined by the Regional Water Quality Control Board, a Water Quality Management Plan shall be prepared and Low Impact Development (LID) measures shall be included pursuant to the applicable NPDES MS4 Permit in effect at the time of permit issuance. For portions of the SPA located in Riverside County, Low Impact Development (LID) features shall be included in the design of individual projects proposed under the Northside Specific Plan. The LID features shall be designed to maximize infiltration, harvest/reuse, evapotranspiration, and treatment, consistent with the Design Handbook for Low Impact Development Best Management Practices (County of Riverside 2011), Water Quality Management Plan for the Santa Ana Region of Riverside County (County of Riverside 2012), and California Green Building Standards Code (CalGreen 2019). The design shall include Source Control and Treatment Best Management Practices (BMPs) and an Operations &amp; Maintenance Plan for the proposed BMPs. The LID features shall address long-term effects on water quality within the Santa Ana River Watershed and ensure BMPs and LID designs minimize potential water quality concerns to the maximum extent practicable.</p>	<p>Prior to approval of development entitlements</p>	<p>Water Quality Management Plan (WQMP)</p>	<p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department - Planning Division, and Public Works Department City of Colton or County of Riverside</p>
<p><b>CM-HYD-2b</b></p> <p>Prior to the issuance of a construction permit for priority projects as defined by the Regional Water Quality Control Board, a Water Quality Management Plan shall be prepared and Low Impact Development (LID) measures shall be included pursuant to the applicable NPDES MS4 Permit in effect at the time of permit issuance. For portions of the SPA located in San Bernardino County, LID features shall be included in the design of individual projects proposed under the Northside Specific Plan. The LID features shall be designed to maximize infiltration, harvest/reuse, evapotranspiration, and treatment, consistent with the City of Colton Water Quality Management Plan Procedures (City of Colton 2003), the Technical Guidance Document for Water Quality Management Plans (WQMP) (County of San Bernardino Stormwater Program 2011), and California Green Building Standards Code (CalGreen 2019). The design shall include Source Control and Treatment BMPs and an Operations &amp; Maintenance Plan for the proposed BMPs. The LID features shall address long term effects on water quality within the Santa Ana River Watershed and ensure BMPs and LID designs minimize potential water quality concerns to the maximum extent practicable.</p>	<p>Prior to the issuance of a construction permit</p>	<p>Water Quality Management Plan (WQMP)</p>	<p>City of Colton</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<b>Mitigation Measures</b>			
<b>MM-HYD-1: Master Drainage Plan.</b>			
<p>In coordination with the Riverside County Flood Control and Water Conservation District (RCFC&amp;WCD), the City of Colton, and the County of Riverside, the City of Riverside shall develop a Master Drainage Plan – Northside Sub-Watershed to address drainage system improvement needs for future planned development within the Northside Specific Plan Area. The improvements shall be designed to ensure that the stormwater conveyance system will convey flows from a 100-year frequency flood events in a manner that ensures 100-year event flooding would not occur within structure development areas. This Master Drainage Plan shall identify when improvements would be needed and shall include information on the cost of the needed improvements, as well as a program to collect fees in order to implement the improvements at the time they are needed. Potential programs that may be utilized include a Community Facilities District, Capitol Improvement Project, or an update to the University Area Drainage Plan and associated addition of a Northside Sub-Watershed fee in accordance with County Ordinance 460. This Master Drainage Plan shall include the following improvements (i.e., Highgrove Channel, Springbrook Wash, and University Wash) at a minimum, as well as address the need for the identified “proposed facilities” in the RCFC&amp;WCD CIP facility map that were generated based on the University Master Drainage Plan (Riverside County Flood Control District 1967).</p>	<p>Upon adoption of the Specific Plan</p>	<p>All applicable jurisdictions: City of Riverside –Public Works Department  City of Colton or County of Riverside</p>	
<b>MM-HYD-1a: Highgrove Overflow Channel.</b>			
<p>As the future developments within the Northside Specific Plan Subareas 2, 4, 5, 6, 7, 8, 9, and 16 take place within the Highgrove Channel 100-year Federal Emergency Management Agency (FEMA) floodplain overflow area, an improvement to the Highgrove Overflow Channel should be constructed consistent with the conceptual recommendations provided by Rick Engineering (2019, Program Environmental Impact Report Appendix F, Hydrology and Water Quality Letter Report), to convey overtopping flow from the existing Highgrove Channel and associated flooding during high intensity rainfall events. As indicated in the recommendation, providing a regional detention facility/basin within the AB Brown Sports Complex is desirable in addition to the improvement of the Highgrove Overflow Channel. The overflow channel should be designed to receive stormwater flows in Highgrove Channel in excess of approximately 1,000 cubic feet per second, and the regional detention facility/basin should be designed such that discharge into downstream Springbrook Wash would be less than or equal to existing conditions (and/or it’s capacity, whichever is larger), to prevent downstream flooding impacts in developed areas. Design of the Highgrove Overflow Channel should be completed in coordination with the City of Riverside, City of Colton, Riverside County Flood Control and Water Conservation District, and Federal Emergency Management Agency (FEMA).</p>	<p>As the future developments within the Northside Specific Plan Subareas 2, 4, 5, 6, 7, 8, 9, and 16 take place</p>	<p>All applicable jurisdictions: City of Riverside –Public Works Department  City of Colton or County of Riverside</p>	
<b>MM-HYD-1b: Springbrook Wash Enhancement.</b>			
<p>As the future developments within the Northside Specific Plan Subareas 2, 4, 5, 6, 7, 8, 9, and 16 take place, the existing Springbrook Wash drainage alignment/facility should be improved in the vicinity of the western boundary of the Former Riverside Golf Course, such that the improved Spring Wash will be aligned to flow within the open space in Subarea 8, farther away from the proposed Northside Specific Plan development, consistent with conceptual recommendations provided by Rick Engineering (2019, Program Environmental Impact Report Appendix F, Hydrology and Water Quality Letter Report). Design of the Springbrook Wash improvements should be completed in coordination with the City of Riverside, Riverside County Flood Control and Water Conservation District, and FEMA prior to implementation of improvements to this area.</p>	<p>As the future developments within the Northside Specific Plan Subareas 2, 4, 5, 6, 7, 8, 9, and 16 take place.</p>	<p>All applicable jurisdictions: City of Riverside –Public Works Department  City of Colton or County of Riverside</p>	
<b>MM-HYD-1c: University Wash Enhancement.</b>			
<p>As the future development within the Northside Specific Plan Subarea 1.1 just east of Orange Street takes place, a preliminary hydraulic analysis should be completed consistent with recommendations by Rick Engineering (2019, Program Environmental Impact Report Appendix F, Hydrology and Water Quality Letter Report) along Springbrook Wash downstream from the confluence with University Wash in order to determine the flooding potential along this stretch of the creek prior to implementation of improvements to this area. Design of the Springbrook Wash improvements should be completed in coordination with the Riverside County Flood Control and Water Conservation District and Federal Emergency Management Agency prior to implementation of improvements to this area.</p>	<p>As the future development within the Northside Specific Plan Subarea 1.1 just east of Orange Street takes place.</p>	<p>All applicable jurisdictions: City of Riverside –Public Works Department  City of Colton or County of Riverside</p>	
<b>MM-HYD-1d: FEMA Revisions.</b>			
<p>A Federal Emergency Management Agency (FEMA) Physical Map Revision or a Letter of Map Revision of the Specific Plan Area should be completed, based on modeling by the Riverside County Flood Control and Water Conservation District, prior to Development Plan Approval of future projects located within the 100-year FEMA flood plain in the Northside Specific Plan Area. Hydrologic modeling in support of the revisions should include, but not be limited to, stormwater runoff within Highgrove Channel, the Highgrove Channel Overflow Channel, Springbrook Wash, and University Wash.</p>	<p>As development occurs within the 100-year FEMA Flood plain</p>	<p>All applicable jurisdictions: City of Riverside –Public Works Department  City of Colton or County of Riverside</p>	

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>MM-HYD-2: Levee Accreditation</b></p> <p>Prior to a Development Plan Approval within the Northside Specific Plan, within the Riverside Levee 2 flood protection area, and in coordination with Federal Emergency Management Agency (FEMA) approval of Physical Map Revisions or Letter of Map Revision of the Specific Plan Area, Riverside Levee 2 should be accredited by FEMA and shown to effectively protect the Northside Specific Plan Area against 100-year flooding hazards related to the Santa Ana River.</p>	<p>Prior to a Development Plan Approval within the Riverside Levee 2 flood protection area</p>		<p>All applicable jurisdictions: City of Riverside – Public Works Department  City of Colton or County of Riverside</p>
<p><b>MM-HYD-3: Storm Drain Enhancement</b></p> <p>Consistent with the concept recommendations provided by Rick Engineering (2019, Program Environmental Impact Report Appendix F, Hydrology and Water Quality Letter Report), storm drains shall be installed in association with Northside Specific Plan development in areas currently lacking storm drains (see Figure 3.9-2, Drainage Conditions). Storm drain installation shall include, but not be limited to:</p> <ol style="list-style-type: none"> <li>1. Extending a backbone storm drain north along Main Street from Springbrook Wash;</li> <li>2. Adding a storm drain system for the proposed light industrial and high-tech business park, within the City of Colton, to safely collect and convey runoff into Highgrove Channel;</li> <li>3. Adding a storm drain system in the proposed transitional business/multifamily residential and medium density residential along Center Street, to collect flows into the proposed Highgrove Overflow Channel (MM-HYD-1); and</li> <li>4. Providing flood control detention to pre-project stormwater runoff conditions for all proposed new developments in the Specific Plan Area, for all design storms required by the Riverside County Flood Control and Water Conservation District.</li> <li>5. Proposed drainage improvements shall be designed per the 1978 Riverside County Flood Control and Water Conservation District Hydrology Manual and in coordination with the Riverside County Flood Control and Water Conservation District.</li> </ol>	<p>As development occurs.</p>		<p>All applicable jurisdictions: City of Riverside – Public Works Department  City of Colton or County of Riverside</p>
<p><b>MM-HYD-4: Hydrology/Drainage Report.</b></p> <p>Prior to the issuance of a building permit for future development within the Northside Specific Plan, a Hydrology/Drainage Report shall be prepared. The Hydrology/Drainage Report shall demonstrate that stormwater runoff flow volume or flow rate, associated with specific projects, would be less than or equal to existing conditions to prevent on- and off-site runoff and flooding. This may require an onsite flood control detention facility/basin at each of the specific projects as a mitigation measure (or regionally). The Hydrology/Drainage Report shall comply with the 1978 Riverside County Flood Control and Water Conservation District Hydrology Manual and the ordinance for storm drain planning and design calculations.</p>	<p>As development occurs</p>		<p>All applicable jurisdictions: City of Riverside – Public Works Department  City of Colton or County of Riverside</p>
<p><b>MM-HYD-5: Flood Elevations.</b></p> <p>Prior to a Development Plan Approval within the Northside Specific Plan, it shall be verified by the City Engineer that development is either (1) located outside the 100-year Federal Emergency Management Agency (FEMA) flood plain, or (2) that the proposed development within the revised 100-year flood plain shall be constructed a minimum of 1 foot above anticipated flood elevations, as determined by FEMA.</p>	<p>As development occurs</p>		<p>All applicable jurisdictions: City of Riverside – Public Works Department  City of Colton or County of Riverside</p>
<p><b>Noise</b></p>			
<p><b>Compliance Measures</b></p>			
<p><b>CM-N01-1: Site-specific Noise Analysis</b></p> <p>Prior to approval of development entitlements, the applicant shall complete a site-specific noise analysis to demonstrate compliance with the City's General Plan 2025 Noise Element Land Use Compatibility for Community Noise Exposure standards, as deemed necessary by the City of Riverside.</p>	<p>Prior to approval of development entitlements.</p>	<p>Approval of Noise Study as deemed necessary by the City of Riverside</p>	<p>City of Riverside – Community &amp; Economic Development Department – Planning Division</p>
<p><b>CM-N01-2: Site-specific Noise Analysis</b></p> <p>Prior to the approval of development entitlements, the applicant shall complete a site-specific noise analysis, as deemed necessary by the City of Colton, to demonstrate compliance with Colton's General Plan Noise Element Land Use Compatibility Criteria.</p>	<p>Prior to the approval of development entitlements.</p>	<p>Approval of Noise Study as deemed necessary by the City of Colton</p>	<p>City of Colton</p>
<p><b>CM-N01-3: Site-specific Noise Analysis</b></p> <p>Prior to the approval of development entitlements, the applicant shall complete a site-specific noise analysis, as deemed necessary by the County of Riverside, to demonstrate compliance with the County's General Plan Noise Element Land Use Compatibility for Community Noise Exposure guidelines.</p>	<p>Prior to the approval of development entitlements.</p>	<p>Approval of Noise Study as deemed necessary by the County of Riverside</p>	<p>County of Riverside</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>CM-MOI-4: Site-specific Noise Analysis</b></p> <p>Prior to the approval of development entitlements, the applicant shall complete a site-specific noise analysis, as deemed necessary by the City of Riverside, to demonstrate compliance with Riverside's Municipal Code Sections 7.25.010 and 7.30.015.</p>	<p>Prior to the approval of development entitlements.</p>	<p>Approval of Noise Study as deemed necessary by the City of Riverside</p>	<p>City of Riverside – Community &amp; Economic Development Department – Planning Division</p>
<p><b>CM-MOI-5: Site-specific Noise Analysis</b></p> <p>Prior to the issuance of any building permit, the applicant shall complete a site-specific noise analysis to demonstrate compliance with the City of Colton Municipal Code Sections 18.42.040 and 18.42.050.</p>	<p>Prior to the approval of development entitlements.</p>	<p>Approval of Noise Study as deemed necessary by the City of Colton</p>	<p>City of Colton</p>
<p><b>CM-MOI-6: Site-specific Noise Analysis</b></p> <p>Prior to the issuance of any building permit, the applicant shall complete a site-specific noise analysis to demonstrate compliance with the County of Riverside Ordinance 847.</p>	<p>Prior to the approval of development entitlements.</p>	<p>Approval of Noise Study as deemed necessary by the County of Riverside</p>	<p>County of Riverside</p>
<p><b>Mitigation Measures</b></p>			
<p><b>MM-MOI-1: Construction Noise Abatement Measures</b></p>			
<p>The following practices would reduce any construction equipment noise level increases to the outdoor ambient sound environment at nearby noise-sensitive residential land uses.</p> <ul style="list-style-type: none"> <li>Prior to approval of grading plans and/or issuance of building permits, a note shall be included on the plans requiring adherence to City of Riverside, City of Colton or County of Riverside allowable hours of construction. The responsible project supervisor shall ensure compliance with these standards on site, and the County or municipal entity having jurisdiction shall conduct site inspections to check for compliance at its discretion.</li> <li>Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, air intakes, shrouds, etc. consistent with manufacturers' standards.</li> <li>Construction contractors shall orient and locate all stationary construction equipment (generators, compressors, pumps, etc.) in a manner that maximizes the distance to a nearest noise-sensitive receptor, and/or directs the loudest side of noise emission away from said receptor.</li> <li>As needed, such as when source-to-receptor distances have been maximized to the extent practical, on-site contractors shall install or field-erect temporary noise barriers to occlude direct paths of sound (and thus attenuate noise level) between noisy equipment and the nearest noise-sensitive receptors. Locating material or debris containers, tanks, trailers, or other solid path-occluding obstructions may also achieve comparable noise reducing effects.</li> <li>Construction contractors shall locate equipment staging in areas that will create the greatest distance between on-site noise-producing equipment, vehicles, and processes and the nearest noise-sensitive receptors to the project site. Construction contractors shall establish a communication channel (telephone and/or email) so that members of the public may report noise concerns. The contractors shall designate a representative (or team) to respond to such inquiries and investigate them in a timely manner. If complaints are determined to be valid and attributed to project construction activity, the representative shall inform the applicable jurisdiction and the construction contractor shall implement reasonable and feasible measures to address the complaint.</li> </ul>	<p>Prior to approval of grading plans and/or issuance of building permits.</p> <p>During Construction</p>	<p>Approval of plans showing location and materials of temporary barrier, if deemed to be necessary</p> <p>Inspection of installed barrier, if deemed to be necessary</p> <p>Periodic inspections during construction</p> <p>Submittal of plans showing staging areas</p>	<p>Contractor</p> <p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department Planning Division and Building &amp; Safety Division</p> <p>City of Colton or County of Riverside</p>
<p><b>MM-MOI-2: Construction Vibration Abatement Measures</b></p>			
<p>If heavy construction equipment similar to those listed in Table 3.11-29 are expected to be in usage on-site and within the indicated screening distances to avoid significant impact, the following shall be implemented:</p> <ul style="list-style-type: none"> <li>A pre-construction condition survey shall be prepared by a qualified independent structural engineer, documenting information that includes existing conditions of the construction site in the vicinity of the off-site vibration-sensitive receptor (e.g., residence or historic structure), and observable conditions of the receiving structure (e.g., façades).</li> <li>During construction, the contractor(s) shall install and maintain at least one continuously operational automated vibration monitor at the receptor(s) of concern. The monitor(s) must be capable of being programmed with at least one pre-determined vibratory velocity level, such as a peak vector sum or single-axis alert equivalent to the following: <ul style="list-style-type: none"> <li>For residential structures, 0.27 inches per second (in/sec) peak particle velocity (PPV) to warn of continuous vibration approaching the 0.3 ips PPV standard.</li> <li>For historic structures, 0.08 inches per second (in/sec) peak particle velocity (PPV) to warn of continuous vibration approaching the 0.12 ips PPV standard.</li> </ul> </li> </ul> <p>The monitoring system must produce real-time specific alerts (e.g., via text message and/or email to on-site personnel) when vibratory velocities exceed the predetermined levels. In the event of an alert, feasible steps to reduce vibratory levels shall be</p>	<p>Prior and During construction.</p>	<p>Prepare a Pre-construction Condition Survey</p>	<p>Qualified Independent Structural Engineer</p> <p>Contractor</p> <p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department Planning Division</p> <p>City of Colton or County of Riverside</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p>undertaken, including but not limited to halting/staggering concurrent activities and using lower-vibratory techniques. In the event of an exceedance alert, work in the vicinity shall be suspended and the concerned building or structure visually inspected for potential damage. Results of the inspection must be logged. Work shall be resumed and re-monitored briefly after implementation of vibration-reducing means or methods. If said methods exhibit vibration velocity levels that are compliant with the standard and remain in usage or in place for the duration of the need construction activity, work may resume until its determined completion on-site. If initial vibration monitoring after installation of these methods demonstrates that threshold approach alerts continue to occur and suggest risk of exceeding the applicable standard, additional and/or better-performing measures shall be applied and then re-assessed with subsequent vibration monitoring that confirms compliance with the standard while such measures are in place and until the vibration-producing has ceased or is completed. A post-construction condition survey shall be prepared by a qualified independent structural engineer, documenting information that includes observable post-construction conditions of the concerned receiving structure(s).</p>			
<b>Public Services</b>			
<b>Compliance Measure</b>			
<b>CM-SRV-1: Payment of Development Impact Fees (City of Colton)</b>			
<p>Prior to the issuance of any building permit, the applicant shall provide the appropriate payment of Developer Impact Fees towards police, fire, and library services as well as Water and Wastewater Capacity Fees stipulated by the City of Colton's Impact Fee Summary, City of Colton's Municipal Code Section 12.32 and associated Ordinance 02-20.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Payment of fees</p>	<p>City of Colton</p>
<b>CM-SRV-2: Payment of Development Impact Fees (County of Riverside)</b>			
<p>Prior to the issuance of any building permit, the applicant shall provide the appropriate payment of Developer Impact Fees towards police, fire, and library services stipulated by the County of Riverside Municipal Code Section 4.60.070.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Payment of fees</p>	<p>County of Riverside</p>
<b>CM-SRV-3: Payment of School Fees</b>			
<p>Prior to the issuance of a building permit, the applicant shall provide the payment of applicable school fees in accordance with Senate Bill 50 and Government Code Section 65995.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Payment of fees</p>	<p>All applicable jurisdictions: City of Riverside – Community &amp; Economic Development Department Planning Division and Building &amp; Safety  City of Colton or County of Riverside</p>
<b>Recreation</b>			
<b>Compliance Measures</b>			
<b>CM-REC-1a: Payment of Park Fees (City of Riverside)</b>			
<p>Prior to the issuance of any building permit, the applicant shall provide the appropriate payment or allocation of parkland in lieu of payment as stipulated by the Local Park and Development fee in the City of Riverside's Municipal Code, Chapter 16.60.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Payment of fees</p>	<p>All applicable jurisdictions: City of Riverside – Park, Recreation and Community Services Department and Community &amp; Economic Development Department Building &amp; Safety</p>
<b>CM-REC-1b: Payment of Trails Fees (City of Riverside)</b>			
<p>Prior to the issuance of any building permit, the applicant shall provide the appropriate payment or allocation of land in lieu of payment as stipulated by the Trails Development fee in the City of Riverside's Municipal Code, Chapter 16.76.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Payment of fees</p>	<p>All applicable jurisdictions: City of Riverside – Park, Recreation and Community Services Department and Community &amp; Economic Development Department Building &amp; Safety</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>CM-REC-2 Payment of Park Fees (City of Colton)</b></p> <p>Prior to the issuance of any building permit, the applicant shall provide the appropriate payment or allocation of parkland in lieu of payment as stipulated by the park impact fee in the City of Colton's Municipal Code, Chapter 16.58.</p>	Prior to the issuance of any building permit.	Payment of fees	City of Colton
<p><b>CM-REC-3 Payment of Park Fees (County of Riverside)</b></p> <p>Prior to the issuance of any building permit, the applicant shall provide the appropriate payment as stipulated by the development impact fee in the County of Riverside Municipal Code Section 4.60.070.</p>	Prior to the issuance of any building permit.	Payment of fees	County of Riverside
<b>Transportation</b>			
<b>Mitigation Measures</b>			
<b>MM-TR-1: Center Street / Stephens Avenue</b>			
<p><i>Existing Plus Project Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Widen east leg of intersection to construct one left-turn lane and one shared through/ right-turn lane on the westbound approach.</li> <li>Widen west leg of intersection to construct one left-turn lane, one through lane, and one right-turn lane on the eastbound approach.</li> <li>Provide protected left-turn phasing on the eastbound and westbound approaches.</li> </ul>	By the end of year 2030.	Approval of Street Improvement Plan	County of Riverside
<b>MM-TR-2: W La Cadena Drive / I-215 SB Ramps / Stephens Avenue</b>			
<p><i>Existing Plus Project and Horizon Year 2040 Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Restripe south leg of intersection to provide one left-turn lane and one shared through/ right-turn lane on the northbound approach.</li> <li>Restripe north leg of intersection to provide one left-turn lane and one shared through/ right-turn lane on the southbound approach.</li> <li>Widen west leg of intersection to construct one shared left-turn/through lane and one right-turn lane on the eastbound approach.</li> <li>Provide protected left-turn phasing on the northbound and southbound approaches.</li> <li>Provide split phasing on the eastbound and westbound approaches.</li> </ul>	By the end of year 2030.	Approval of Street Improvement Plan	County of Riverside
<b>MM-TR-3: West Center Street / Hightgrove Place</b>			
<p><i>Existing Plus Project Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Provide permitted left-turn phasing on all four approaches.</li> <li>Widen east leg of intersection to construct one left-turn lane and one shared through/ right-turn lane on the westbound approach (Does not apply to impacts under the Horizon Year 2040 scenarios)</li> <li>Widen west leg of intersection to construct one left-turn lane and one shared through/ right-turn lane on the eastbound approach. (Does not apply to impacts under the Horizon Year 2040 scenarios)</li> </ul> <p><i>Horizon Year 2040 Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Provide permitted left-turn phasing on all four approaches</li> </ul>	By the end of year 2030 and 2040.	Approval of Street Improvement Plan	County of Riverside
<b>MM-TR-4: W La Cadena Drive / I-215 SB Ramps / Interchange Drive</b>			
<p><i>Existing Plus Project and Horizon Year 2040 Scenarios</i></p> <p>The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Widen north leg of intersection to construct one left-turn lane, one shared left-turn/ through lane, and one right-turn lane on the southbound approach.</li> <li>Widen westbound approach (Southbound I-215 Off-Ramp) to construct one shared left-turn/through lane and one shared through/right-turn lane.</li> </ul>	By the end of year 2030.	Approval of Street Improvement Plan	County of Riverside - Public Works Department

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<ul style="list-style-type: none"> <li>Provide split phasing for all four intersection approaches.</li> <li>Provide a right-turn overlap phase on the southbound approach.</li> </ul>			City of Riverside – Public Works Department
<p><b>MM-TR-5: E La Cadena Drive / I-215 NB Ramps</b>                      Existing Plus Project and Horizon Year 2040 Scenarios                      The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Restripe northbound approach to provide one left-turn lane and one shared left-turn/through lane.</li> <li>Restripe the Northbound I-215 On-Ramp to eliminate the existing southbound channelized right-turn movement and provide a second receiving lane for the recommended second northbound left-turn lane.</li> <li>Provide split phasing on the northbound and southbound approaches.</li> </ul>	By the end of year 2030.	Approval of Street Improvement Plan	City of Riverside – Public Works Department
<p><b>MM-TR-6: Columbia Avenue / E La Cadena Drive</b>                      Existing Plus Project Scenarios                      The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Modify signal phasing to provide a right-turn overlap phase on the westbound approach.</li> </ul> <p>Horizon Year 2040 Scenarios                      The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>Modify signal phasing to provide a right-turn overlap phase on the westbound approach.</li> <li>Restripe eastbound approach to convert the existing right-turn lane to a shared through/right-turn lane, which will provide three through lanes on the eastbound approach.</li> </ul>	By the end of year 2030 and 2040.	Approval of Street Improvement Plan	City of Riverside – Public Works Department
<p><b>MM-TR-7: Main Street / Placentia Lane-Center Street</b>                      Existing Plus Project Scenarios                      The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Provide protected left-turn phasing on the northbound and southbound approaches.</li> <li>Provide permitted left-turn phasing on the eastbound and westbound approaches.</li> <li>Provide a right-turn overlap phase on the westbound approach.</li> <li>Widen east leg of intersection to construct one shared left-turn/through lane and one right-turn lane on the westbound approach.</li> </ul> <p>Horizon Year 2040 Scenarios                      The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Provide protected left-turn phasing on the northbound and southbound approaches.</li> <li>Provide permitted left-turn phasing on the eastbound and westbound approaches.</li> <li>Provide a right-turn overlap phase on the westbound approach.</li> </ul>	By the end of year 2030 and 2040.	Approval of Street Improvement Plan	City of Riverside – Public Works Department
<p><b>MM-TR-8: Main Street / Garner Road</b>                      Existing Plus Project and Horizon Year 2040 Scenarios                      The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Provide protected left-turn phasing on the northbound and southbound approaches.</li> <li>Provide permitted left-turn phasing on the eastbound and westbound approaches.</li> </ul>	By the end of year 2030.	Approval of Street Improvement Plan	City of Riverside – Public Works Department
<p><b>MM-TR-9: Main Street / Strong Street</b>                      Existing Plus Project Scenarios                      The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Restripe the eastbound approach to provide one left-turn lane and one shared through/ right-turn lane.</li> <li>Restripe the westbound approach to provide one left-turn lane and one shared through/ right-turn lane.</li> </ul> <p><b>Note: The Roquet Ranch Specific Plan and The Exchange projects are both required to implement the recommended improvements described above at the intersection of Main Street / Strong Street. Therefore, project responsibility would be shared between the Northside Specific Plan and these two projects.</b></p>	By the end of year 2030.	Approval of Street Improvement Plan	City of Riverside – Public Works Department

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>MM-TR-10: Main Street / Oakley Avenue / SR60 WB On Ramp</b> Existing Plus Project and Horizon Year 2040 Scenarios The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Restripe westbound approach to provide one shared left-turn/through/right-turn lane and one right-turn lane.</li> </ul>	By the end of year 2030.	Approval of Street Improvement Plan	City of Riverside – Public Works Department
<p><b>MM-TR-11: Orange Street / Center Street</b> Existing Plus Project Scenarios The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Widen east leg of intersection to construct one left-turn lane and one shared through/ right-turn lane on the westbound approach, and construct two eastbound receiving lanes.</li> <li>Widen and restripe west leg of intersection to provide one shared left-turn/through lane and one shared through/right-turn lane on the eastbound approach.</li> </ul> <p>Horizon Year 2040 Scenarios The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>Restripe westbound approach to provide one left-turn lane, one through lane and one right-turn lane.</li> </ul>	By the end of year 2030 and 2040	Approval of Street Improvement Plan	City of Riverside – Public Works Department
<p><b>MM-TR-12: South Riverside Avenue / Future Pellissier Road</b> Existing Plus Project and Horizon Year 2040 Scenarios The following improvements are recommended to be implemented by the end of Year 2030:</p> <ul style="list-style-type: none"> <li>Install a traffic signal at the intersection.</li> <li>Construct one left-turn lane and one right-turn lane on the westbound approach.</li> <li>Provide protected left-turn phasing on the southbound approach.</li> </ul> <p><b>Note: It is recommended that the City enter into a Memorandum of Understanding (MOU) with the City of Colton to allow for the transfer of fair share fees and promote completion of the Identified Improvements at the South Riverside Avenue / Pellissier Road intersection.</b></p>	By the end of year 2030	Approval of Street Improvement Plan	City of Colton
<p><b>MM-TR-13: Main Street / Spruce Street</b> Horizon Year 2040 Scenarios The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>Transition the existing shared through/right-turn lane to a dedicated right-turn lane. The other Specific Plan scenarios assume a single shared through/right-turn lane per proposed road diet on Main Street.</li> </ul>	By the end of year 2040	Approval of Street Improvement Plan	City of Riverside – Public Works Department
<p><b>MM-TR-14: Orange Street / Columbia Avenue</b> Horizon Year 2040 Scenarios The following improvements are recommended to be implemented by the end of Year 2040:</p> <ul style="list-style-type: none"> <li>Restripe the north leg of intersection to provide one left-turn lane and one shared through/right-turn lane on the southbound approach.</li> <li>Restripe the south leg of intersection to provide one left-turn lane and one shared through/right-turn lane on the northbound approach.</li> <li>Widen westbound approach to construct a dedicated right-turn lane (Scenario One With Orange Street Extension Only Impact TR-15D).</li> </ul>	By the end of year 2040	Approval of Street Improvement Plan	City of Riverside – Public Works Department
<p><b>MM-TR-15: Adopt a Traffic Mitigation Fee Program</b> Within 12 months of the Northside Specific Plan approval, the City shall fund and subsequently adopt a fee mitigation program based on the Nexus Study (EIR Appendix H; Rick Engineering 2020), as follows:</p> <ol style="list-style-type: none"> <li>The mitigation program shall be based on the costs identified in the nexus study for the traffic improvements <b>MM-TR-1</b> to <b>MM-TR-14</b> as well as <b>PDF-TR-1</b> to <b>PDF-TR-12</b>. The mitigation program shall identify how the funds will be collected on a per project basis (e.g., by trip generated, unit, etc.). Costs shall include program administration, project administration and management, design and engineering, regulatory compliance, and construction. As indicated <b>MM-TR-1</b> to <b>MM-TR-14</b>, the mitigation program shall require the completion of improvements by the year 2030 for all impacts occurring under the Existing Plus Project scenario, and the completion of the improvements by the year 2040 for all impacts occurring under the Horizon Year conditions consistent with the Nexus Study. In addition, <b>PDF-TR-1</b> to <b>PDF-TR-8</b> shall be required to be implemented prior to the end of Year 2030 and <b>PDF-TR-9</b> to <b>PDF-TR-12</b> shall be required to be implemented prior to the end of Year 2040 consistent with the Nexus Study.</li> </ol>	Within 12 months of the Northside Specific Plan approval.	Adopt a Mitigation Fee Program Complete an annual public report on the Northside Specific Plan traffic mitigation program	Qualified Traffic Engineer City of Riverside – Public Works Department

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p>b. Once the Northside Specific Plan traffic mitigation program is established, each project shall contribute its fair share of the traffic improvements as identified in the program prior to Certificate of Occupancy Permit.</p> <p>c. The City shall deposit the funds in a specific account dedicated for the use of completing the improvements identified in the Northside Specific Plan traffic mitigation program. The funds shall be used exclusively for the purpose of implementing mitigation for the impacts associated with buildout of the Specific Plan; however, upon completion of a citywide nexus study, this program could include additional improvements related to multi-modal facilities as well.</p> <p>d. The City shall complete an annual public report on the Northside Specific Plan traffic mitigation program within 180 days of the completion of the fiscal year pursuant to the Mitigation Fee Act (California Government Code Section 66000 et seq.). Considering the Nexus Study estimates improvement costs based on the Year 2020 (i.e., 2020 dollars), an evaluation of improvement costs (see part "a" above) shall be completed by a qualified Traffic Engineer in this annual assessment and approved by the applicable jurisdiction's Traffic Engineer to determine if changes in fees are necessary to ensure adequate funds are collected to complete the identified improvements within the identified timeframes.</p>			
<p><b>MM-TR-16: Traffic Mitigation Agreement</b></p>	<p>Within 12 months of the adoption of the Traffic Mitigation Fee Program</p>	<p>Traffic Mitigation Agreement with Caltrans, the City of Colton, and the County of Riverside</p>	<p>City of Riverside – Public Works Department City of Colton and County of Riverside</p>
<p><b>Utilities and Service Systems</b></p>			
<p><b>Compliance Measures</b></p>			
<p><b>CM-US-1a: Drainage Fees (City of Riverside)</b></p>	<p>Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Subdivision Code Drainage Fees in the City of Riverside's Municipal Code, Title 18.</p>	<p>Payment of fees</p>	<p>City of Riverside – Community &amp; Economic Development Department Building &amp; Safety Division and Public Works Department</p>
<p><b>CM-US-1b: Storm Drain Facilities Fees (City of Colton)</b></p>	<p>Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Storm Drain Facilities Fee for Drainage Benefit Area No.1 in the City of Colton's Municipal Code, Chapter 12.34</p>	<p>Payment of fees</p>	<p>City of Colton</p>
<p><b>CM-US-1c: Sewer and Water Fees (County of Riverside)</b></p>	<p>Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Determination of Charges for Sewer and Domestic Water Services in the County of Riverside's Municipal Code, Chapter 4.48.070.</p>	<p>Payment of fees</p>	<p>County of Riverside</p>
<p><b>CM-US-2a: Sewer Fees (City of Riverside)</b></p>	<p>Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Sewer Service Charges in the City of Riverside's Municipal Code, Chapter 14.04.</p>	<p>Payment of fees</p>	<p>City of Riverside– Community &amp; Economic Development Department Building &amp; Safety Division and Public Works Department</p>

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Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party	
<b>CM-US-2b: Sewer Fees (City of Colton)</b>				
Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Sewer Service Charges in the City of Colton's Municipal Code, Chapter 13.16, and appropriate water and wastewater fees (City of Colton 20.16a, b).	Prior to the issuance of any construction permit.	Payment of fees	City of Colton	
<b>CM-US-2c: Drainage Fees (County of Riverside)</b>				
Prior to the issuance of any construction permit, the applicant shall provide the appropriate payment as stipulated by the Fees for drainage) in the County of Riverside's Municipal Code, Chapter 12.08.070.	Prior to the issuance of any construction permit.	Payment of fees	County of Riverside - Community & Economic Development Department Building & Safety Division and Public Works Department	
<b>CM-US-3a: Wireless Telecommunications Guidelines (City of Riverside)</b>				
Prior to the issuance of any construction permit, the applicant shall abide by the guidelines as stipulated in the Wireless Telecommunication Facilities in the City of Riverside's Municipal Code, Chapter 19.530.	Prior to the issuance of any construction permit.	Payment of fees	City of Riverside - Community & Economic Development Department Building & Safety Division	
<b>CM-US-3b: Wireless Telecommunications Guidelines (City of Colton)</b>				
Prior to the issuance of any construction permit, the applicant shall abide by the guidelines as stipulated in the Telecommunication and Antenna Towers in the City of Colton's Municipal Code, Chapter 18.39.	Prior to the issuance of any construction permit.	Payment of fees	City of Colton	
<b>Tribal Cultural Resources</b>				
<b>Mitigation Measures</b>				
<b>MM-TCR-1: Inadvertent Discovery of Tribal Cultural Resources</b>				
While no tribal cultural resources (TCRs) have been identified that may be affected by the proposed Northside Specific Plan area, if the City determines that the potential resource is a TCR (as defined by PRC, Section 2.107.4), adherence to <b>MM-CUL-3b</b> , which identifies the treatment and disposition for the inadvertent discovery of Native American cultural resources, would be applicable for the handling of the inadvertent discovery of TCRs. <b>MM-CUL-3b</b> would require notifying tribes, in the case of TCRs, consulting under Assembly Bill 52 and Senate Bill 18 within 24 hours of discovery ( <b>MM-CUL-3b1</b> ); temporary curation and storage of discovered resources ( <b>MM-CUL-3b2</b> ); and protocol for the treatment and final disposition of the cultural resources ( <b>MM-CUL-3b3</b> ). If the potential resource is archaeological in nature, appropriate management requirements shall be implemented as outlined in mitigation measures <b>MM-CUL-3a</b> through <b>MM-CUL-3c</b> require that all construction work is immediately stopped until a qualified archaeologist can evaluate the significance of the find, and evaluate potentially significant impacts to archaeological resources and <b>MM-CUL-4</b> requires proper evaluation of the resource and implementation of avoidance or impact reduction. Implementation of proposed recommendations will be made based on the determination of the City that the approach is reasonable and feasible. All activities would be conducted in accordance with regulatory requirements.	Prior to ground disturbance or issuance of grading permit	Refer to MM-CUL-3b through MM-CUL-4	Refer to MM-CUL-3b through MM-CUL-4	All applicable jurisdictions: City of Riverside - Community & Economic Development Department Planning Division and HPO  City of Colton or County of Riverside
<b>Wildfire</b>				
<b>Compliance Measures</b>				
<b>CM-WDF-1a: Emergency Operations Plan</b>				
Prior to the issuance of any building permit, it shall be confirmed that the operations of the development is in accordance with the City of Riverside 2017 Emergency Operations Plan for all construction and operation.	Prior to the issuance of any building permit.	Demonstrate compliance with City of Riverside Emergency Operations Plan	City of Riverside - Fire Department	
<b>CM-WDF-1b: City of Colton Local Hazard Mitigation Plan</b>				
Prior to the issuance of any building permit, it shall be confirmed that the operations of the development is in accordance with the Mitigation Actions included in Table 6-2 of the City of Colton Local Hazard Mitigation Plan.	Prior to the issuance of any building permit.	Demonstrate compliance with City of Colton Local Hazard Mitigation Plan	City of Colton	
<b>CM-WDF-1c: Riverside Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan</b>				
Prior to the issuance of any building permit, it shall be confirmed that the operations of the development is in accordance with the goals, and objectives included in Section 8.0 of the Riverside Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan.	Prior to the issuance of any building permit.	Demonstrate compliance with Riverside Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan	County of Riverside	

4 – Mitigation Monitoring and Reporting Program

Applicant Proposed Measures/Mitigation Measures	Monitoring Timing	Monitoring Reporting Method	Responsible Party
<p><b>CM-MDF-2a</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the City of Riverside Fire Code.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Demonstrate compliance with the City's Fire Code</p>	<p>City of Riverside – Fire Department</p>
<p><b>CM-MDF-2b</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the City of Colton Fire Code.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Demonstrate compliance with the City's Fire Code</p>	<p>City of Colton</p>
<p><b>CM-MDF-2c</b> Prior to the issuance of any building permit, it shall be confirmed that building plans shall be prepared in accordance with the County of Riverside Uniform Fire Code.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Demonstrate compliance with the County's Fire Code</p>	<p>County of Riverside</p>
<p><b>CM-MDF-3a</b> Prior to project approval, the applicant shall submit a Fire Protection Plan for approval by the City of Riverside Development Services Department that demonstrates that the proposed development can provide fire services that meet the minimum travel times identified in City of Riverside General Plan, which is 5 minutes for Riverside's urbanized areas.</p>	<p>Prior to project approval.</p>	<p>Approval of Fire Protection Plan</p>	<p>City of Riverside – Fire Department</p>
<p><b>CM-MDF-3b</b> Prior to project approval, the applicant shall submit a Fire Protection Plan for approval by the City of Colton Development Services Department that demonstrates that the proposed development complies with fire safety standards identified in Title 15 of the Colton Municipal Code and State Wildland-Urban Interface code requirements.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Approval of Fire Protection Plan</p>	<p>City of Colton</p>
<p><b>CM-MDF-3c</b> Prior to project approval, the applicant shall submit a Fire Protection Plan for approval by the County of Riverside Development Services Department that demonstrates that the proposed development can provide fire services that meet the minimum travel times identified in Riverside County Fire Department Fire Protection and EMS Strategic Master Plan.</p>	<p>Prior to project approval.</p>	<p>Approval of Fire Protection Plan</p>	<p>County of Riverside</p>
<p><b>CM-MDF-4</b> Prior to the issuance of any building permit, it shall be confirmed that building plans are in accordance with the Compliance with 2019 California Fire Code Standards (such as incorporation of sprinklers, maintenance of all flammable vegetation or other combustible growth within 30 feet of buildings, and other building code requirements).</p>	<p>Prior to the issuance of any building permit.</p>	<p>Approval of construction plans</p>	<p>All applicable jurisdictions: City of Riverside – Fire Department City of Colton or County of Riverside</p>
<p><b>CM-MDF-5</b> Prior to the issuance of any building permit, it shall be confirmed that all dead-end fire access roads in excess of 150-feet in length shall be provided with approved provisions that allow emergency apparatus to turn around. A cul-de-sac shall be provided in residential areas where the access roadway serves more than two structures. The minimum, unobstructed paved radius width for a cul-de-sac shall be provided in accordance with each jurisdiction's standards applicable at the time of approval.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Approval of construction plans</p>	<p>All applicable jurisdictions: City of Riverside – Fire Department City of Colton or County of Riverside</p>
<p><b>CM-MDF-6</b> Prior to the issuance of any building permit, it shall be confirmed that all fuel modifications shall be installed prior to the final inspection for issuance of a certificate of occupancy. Roadway access, water supply system, and vegetation fuel modification of common roadway access areas shall be completed in each phase before a building permit is issued for any parcel within the phase.</p>	<p>Prior to the issuance of any building permit.</p>	<p>Approval of construction plans</p>	<p>All applicable jurisdictions: City of Riverside – Fire Department City of Colton or County of Riverside</p>

## 4.2 References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.

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