

Appendix A

NOP and NOP Comments



City of Arts & Innovation

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT Planning Division

NOTICE OF PREPARATION OF DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) NORTHSIDE SPECIFIC PLAN (P19-0065) FOR THE CITY OF RIVERSIDE, CALIFORNIA

TO: See Distribution List

FROM LEAD AGENCY: City of Riverside
Community & Economic Development Dept.
Planning Division
Jay Eastman, AICP – Principal Planner
3900 Main Street, 3rd floor
Riverside, California 92522

DATE: March 29, 2019

SUBJECT: Notice of Preparation of a Draft Environmental Report (EIR)

The City of Riverside will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below. The City needs to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our Agency when considering your permit or other approval for the project.

The project description, location and the potential environmental effects of the project are identified below. Maps illustrating the project location and proposed uses are attached. Note that additional materials are available at the City of Riverside office (see Lead Agency address above), including the distribution list, detailed project description, Initial Study, and the Northside Specific Plan Baseline Opportunities & Constraints Analysis (dated August 2017). These materials are also available online at: <http://northsideplan.com/>

Due to time limits mandated by State law, your response must be sent at the earliest possible date, **but no later than 30 days** after receipt of this notice.

An agency scoping meeting has been scheduled for April 17, 2019, at 6:00 PM, in the Springbrook Clubhouse at 1011 Orange Street, Riverside, California.

Please send your response to Jay Eastman, Principal Planner, at the address shown above. We will need the name and contact person in your agency. If you have any questions, please contact Jay Eastman at (951) 826-5264 or via e-mail at jeastman@riversideca.gov.

PROJECT TITLE: Northside Neighborhood & Pellissier Ranch Specific Plan and Program Environmental Impact Report (Northside Specific Plan)

PROJECT APPLICANT: City of Riverside, Community & Economic Development Department

PROJECT SETTING:

The Northside Specific Plan covers an approximate area of 1,700 acres that include land within the jurisdictional boundaries of the City of Riverside, the City of Colton, and the County of Riverside (Figure 1). The SPA is generally east of the Santa Ana River, south of the La Loma Hills, north of Fairmont Park, and west of the BNSF Railroad line. State Route (SR-60) generally bisects the site to the south and Interstate 215 (I-215) generally acts as the western boundary. The site is currently designated for a mix of residential, commercial, industrial, public facilities, recreation, and open space uses. Please reference Figures 1 to 3 for specifics.

PROJECT DESCRIPTION:

The Northside Specific Plan has been designed to accommodate a safe, healthy and balanced community that celebrates the history and culture of the greater Riverside area while providing recreation and open space opportunities for the region. The proposed balance of residential, commercial, employment and agriculture would be linked together through safe streets, connected trails, greenbelts and bicycle corridors. The plan also recognizes the importance of community features, and proposes to establish a Spanish Town Heritage Village; and restore and enhance Springbrook Arroyo within a new neighborhood center and expanded central park area. The landscaping and architectural details of the plan would reflect a connection with the past, from the early settlement of La Placita and the Old Spanish Trail period, to twentieth century Riverside. The Specific Plan includes the following land use categories: Medium Density Residential (MDR), Medium High Density Residential (MHDR), High Density Residential (HDR), Business/Office Park (B/OP), Commercial (C), Public Facilities and Institutional Uses (PF), Mixed Use (MU), Northside Village Center, (NVC), Freeway Mixed Use (FMU), Spanish Town Heritage Village (STHV), and Recreation Open Space, Parks, and Trails. In addition to the land use categories, a Transition Zone Overlay covers key areas along Main Street, Center Street, Orange Avenue and the City of Colton, including Pellissier Ranch and adjacent Light Industrial properties. The definitions of each land use category and the overlay are included in the Project Description attached to the Initial Study (available at the City of Riverside or online). Refer to Figure 4 for a map of the proposed Specific Plan uses.

ISSUES OF CONCERN/SUMMARY OF PROBABLE ENVIRONMENTAL EFFECTS:

The Program Environmental Impact Report (EIR) will address all environmental topics. For the proposed project, key environmental issues of concern are anticipated to include potentially significant impacts to aesthetics, air quality, biological resources, cultural resources, energy, geology/soils (paleontological resources), greenhouse gas emissions, hazards and hazardous materials, hydrology/water quality, land use/planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities/service systems, and wildfire. Refer to the attached Initial Study for additional details. In summary, the analysis in the EIR will include the following specific categories of environmental impacts and concerns related to the proposed project:

Aesthetics: The EIR will address the potential effects on scenic vistas, scenic corridors, visual character, and light and glare.

Air Quality: The EIR will describe existing air quality conditions and will evaluate the potential air quality impacts of the Northside Specific Plan consistent with Southern California Air Quality Management District methodology. The EIR will discuss the measures included in the Northside Specific Plan to minimize impacts of criteria air pollutant emissions.

Biological Resources: The EIR will describe the existing biological conditions within the SPA, and potential impacts of the Northside Specific Plan on vegetation and wildlife, including special status species. The EIR will evaluate the likelihood of any significant impacts, including consistency with the Stephen's Kangaroo Rat Habitat Conservation Plan and Western Riverside County Multiple Species Habitat Conservation Plan.

Cultural Resources: The EIR will address potential impacts to historic structures, and archaeological resources.

Energy: The EIR will evaluate the project's anticipated energy usage to determine if the project would involve wasteful, inefficient, or unnecessary consumption of energy resources. In addition, this evaluation would address the project's consistency with renewable energy or energy efficiency plans.

Geology/Soils: The EIR will identify if the site contains potentially significant paleontological resources, and determine if the project impacts would be significant. Due to required compliance with the California Building Code, all other potential geology/soils issues were found to be less than significant in the Initial Study.

Greenhouse Gas Emissions: The EIR will examine the potential impacts of implementing the Northside Specific Plan relative to greenhouse gas (GHG) emissions and global climate change. The EIR will discuss the measures included in the Northside Specific Plan to minimize impacts of GHG emissions.

Hazards and Hazardous Materials: The EIR will include a description of the potential hazards in the specific planning area and the health and safety effects based on implementation of the Northside Specific Plan.

Hydrology/Water Quality: The EIR will discuss the drainage conditions throughout the plan area, the potential for flooding hazards, and effects to groundwater. The project is located partially within a flood hazard zone related to the Riverside Levee 2 and the EIR shall address this potential flooding hazard. The area also is covered by the Groundwater Management Plan for the Riverside Groundwater Basin, and compliance with this plan will be addressed in the EIR. Adherence to local, state and federal standards ensure that the project would not substantially degrade water quality or alter hydrology in a manner that would result in flooding impacts.

Land Use/Planning: The EIR will identify the land uses in the planning area and evaluate potential land use constraints created by existing conditions. The compatibility of the Northside Specific Plan with existing and proposed land uses in the planning area and consistency with city policies and plans will be evaluated.

Noise: The EIR will discuss noise impacts from implementation of the Northside Specific Plan, including impacts from area noise sources (e.g., railroads, airports, SR-60 and I-215 freeways, etc.). A noise analysis will identify existing settings and noise level scenarios associated with implementation of the Northside Specific Plan. The EIR will address potential noise impacts associated with the implementation of the Northside Specific Plan on residential and other sensitive receptor land uses. Conformance to local noise guidelines will be analyzed.

Population and Housing: The EIR will evaluate the potential for the proposed land uses of the Northside Specific Plan to result in unplanned population or housing growth. As the project will include more housing than is existing, no significant displacement is anticipated.

Public Services: The EIR will identify existing police, fire, schools, parks, and other public services and facilities serving the cities of Riverside and Colton, and will quantify the increase in service demands resulting from implementation of the Northside Specific Plan. The availability and adequacy of existing services will be analyzed.

Recreation: The EIR will discuss the potential to result in the increase in the use of existing recreational facilities that may result in an accelerated physical deterioration of such facilities.

Transportation: The traffic analysis prepared for the Northside Specific Plan and EIR will describe the existing roadway conditions, circulation patterns, and other elements of the transportation system in the planning area, including the local streets and intersections and regional facilities (e.g., SR-91 freeway, I-215 freeway, etc.). A transportation modeling analysis will be prepared in order to evaluate full build-out of the Northside Specific Plan on the overall transportation network. The Northside Specific Plan's compliance with adopted policies, plans, and programs supporting alternative modes of transportation will also be discussed.

Tribal Cultural Resources: The EIR will discuss the potential for impacts to tribal cultural resources, including those qualifying as historical resources.

Utilities/Service Systems: The EIR will discuss the ability of existing infrastructure in the cities of Riverside and Colton, such as sanitary sewer, storm drains, water supply, and solid waste, to serve full buildout of the Northside Specific Plan. The EIR will also discuss the availability of the existing water supply to provide for full buildout of the Northside Specific Plan.

Wildfire: A very high fire severity zone is located to the north of the Specific Plan area. The EIR will discuss the project's potential to impair an emergency response plan, exacerbate wildfire risk, or expose people to secondary effects of wildfire such as slope instability or drainage changes.

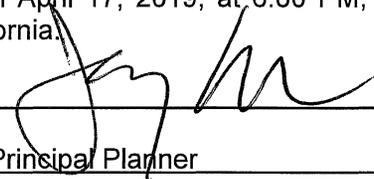
Project Alternatives: Identification of potential alternatives to the Northside Specific Plan will be addressed. Analysis of a "No Project" alternative is required by law. Up to three alternatives, in addition to the "No Project–No Build" Alternative, will be evaluated. One Alternative will include Springbrook Heritage Parklands & Walking Trails Plan; while another will examine additional land use changes only on Riverside controlled properties. A third alternative that will be explored will include a hybrid of land uses identified in the proposed project that could reduce environmental impacts. The evaluation of alternatives will provide a comparative analysis of alternatives to the proposed Northside Specific Plan.

Cumulative Impact Analysis: The EIR will include a discussion of the potentially significant cumulative impacts of the Northside Specific Plan when considered with other past, present, and reasonably foreseeable future projects in the area.

The EIR will identify the degree to which each alternative might reduce one or more of the impacts associated with implementation of the Northside Specific Plan, whether or not the alternative could result in other or increased impacts, the viability of the alternative, and the degree to which the alternative is consistent with project goals and objectives.

COMMENTARY PERIOD: The NOP commentary period is between March 29, 2019 and April 29, 2019. Comments can be mailed to 3900 Main Street, 3rd floor, Riverside, CA 92522 or emailed to jeastman@riversideca.gov to the attention of Jay Eastman.

SCOPING MEETING: The City of Riverside will hold a formal public Scoping Meeting on the above noted project on April 17, 2019, at 6:00 PM, in the Springbrook Clubhouse at 1011 Orange Street, Riverside, California

SIGNATURE:  JAY EASTMAN

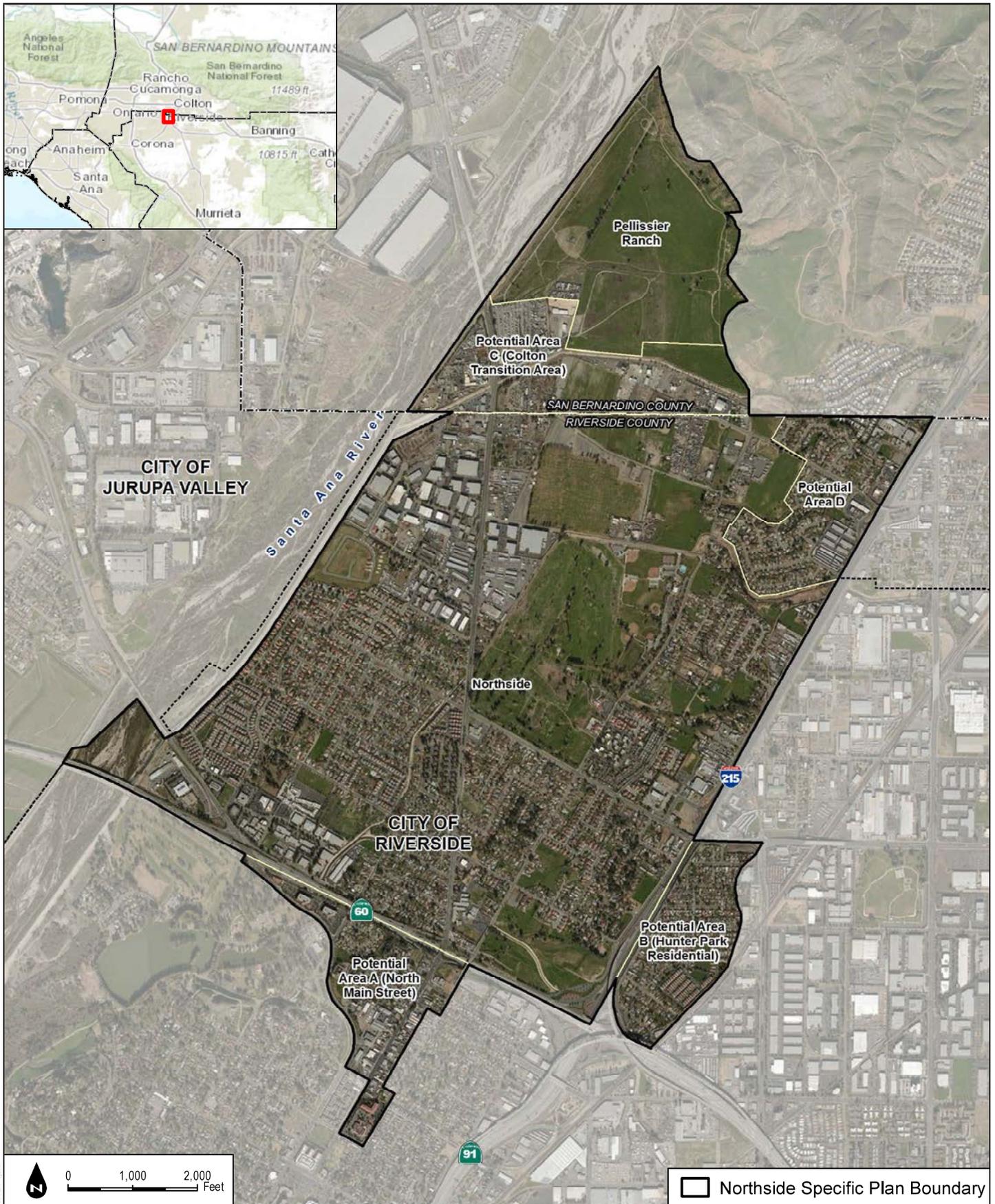
TITLE: Principal Planner

TELEPHONE: 951.826.5264

DATE: March 29, 2019

- ATTACHMENTS:**
- Figure 1 – Overview Map
 - Figure 2 – Topographic Map
 - Figure 3 – Existing General Plan Designations
 - Figure 4 – Proposed Specific Plan Land Uses

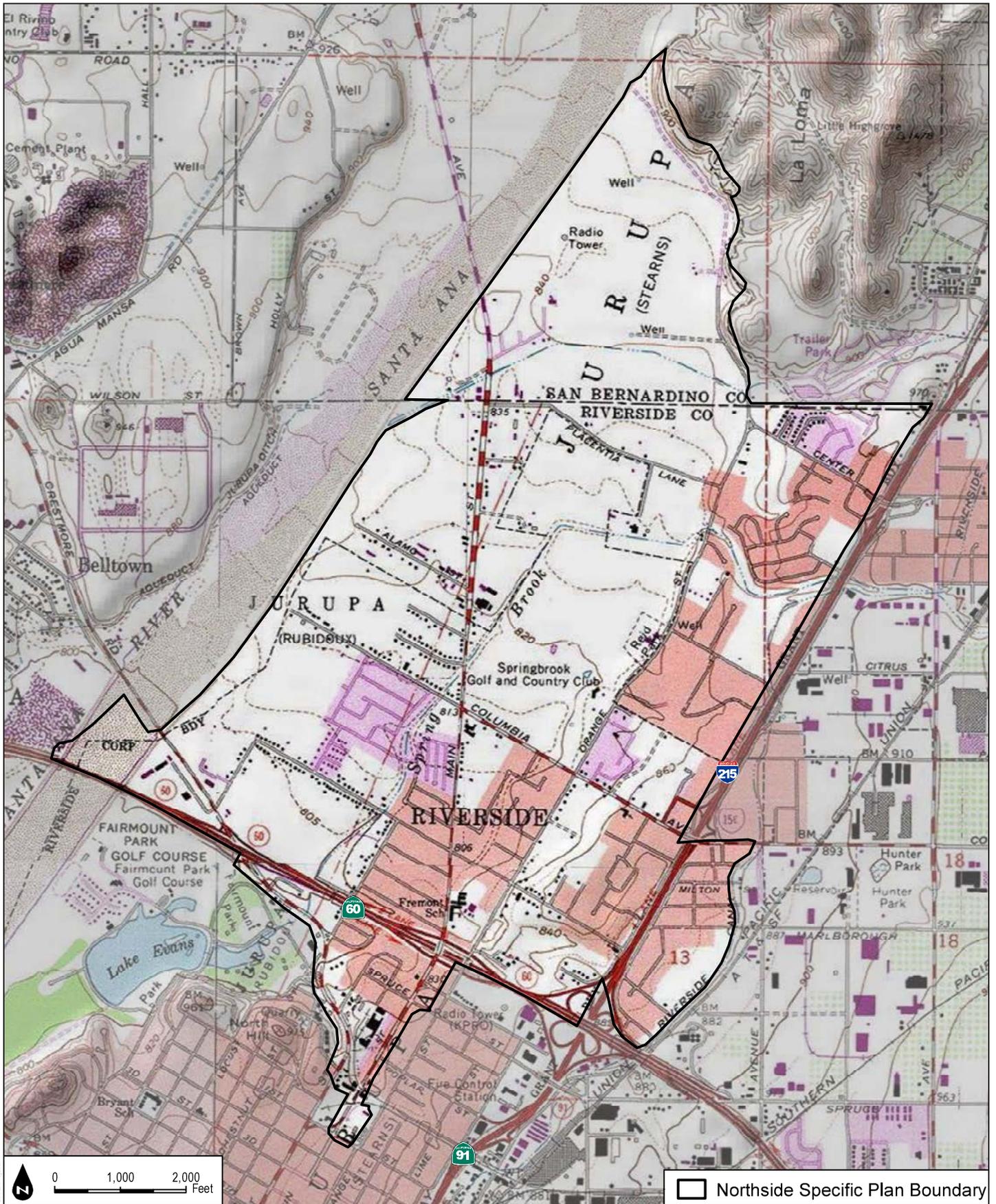
- AVAILABLE AT THE CITY OF RIVERSIDE OFFICE AND ONLINE:**
- Distribution List
 - Detailed Project Description with Land Use Table
 - Initial Study
 - Northside Specific Plan Baseline Opportunities & Constraints Analysis



SOURCE: City of Riverside 2017; Bing Maps 2017; ESRI 2017

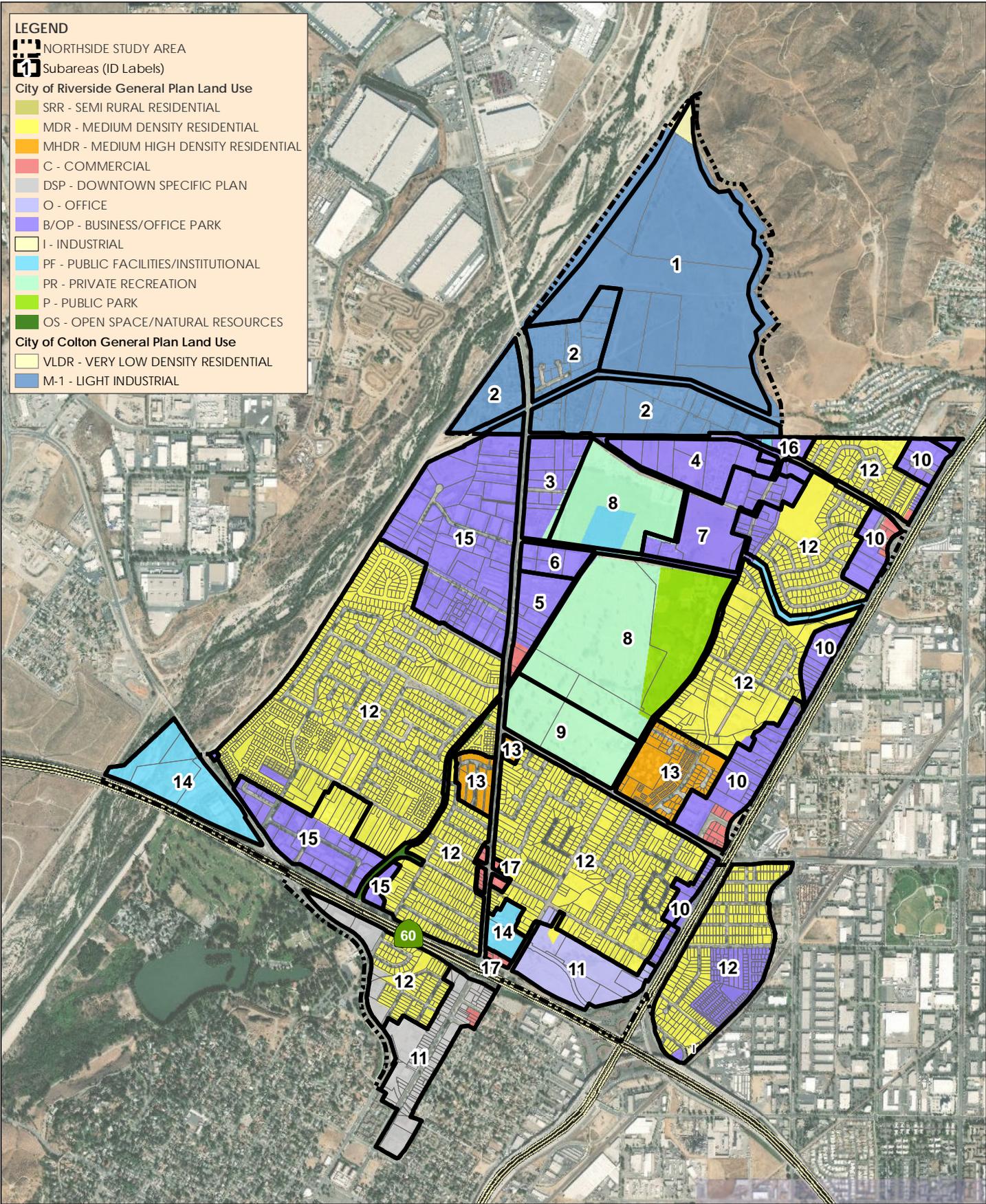
FIGURE 1

Overview Map
Northside Specific Plan



SOURCE: City of Riverside 2017; USGS 7.5-Minute Series Fontana, Riverside East, and San Bernardino South Quadrangles

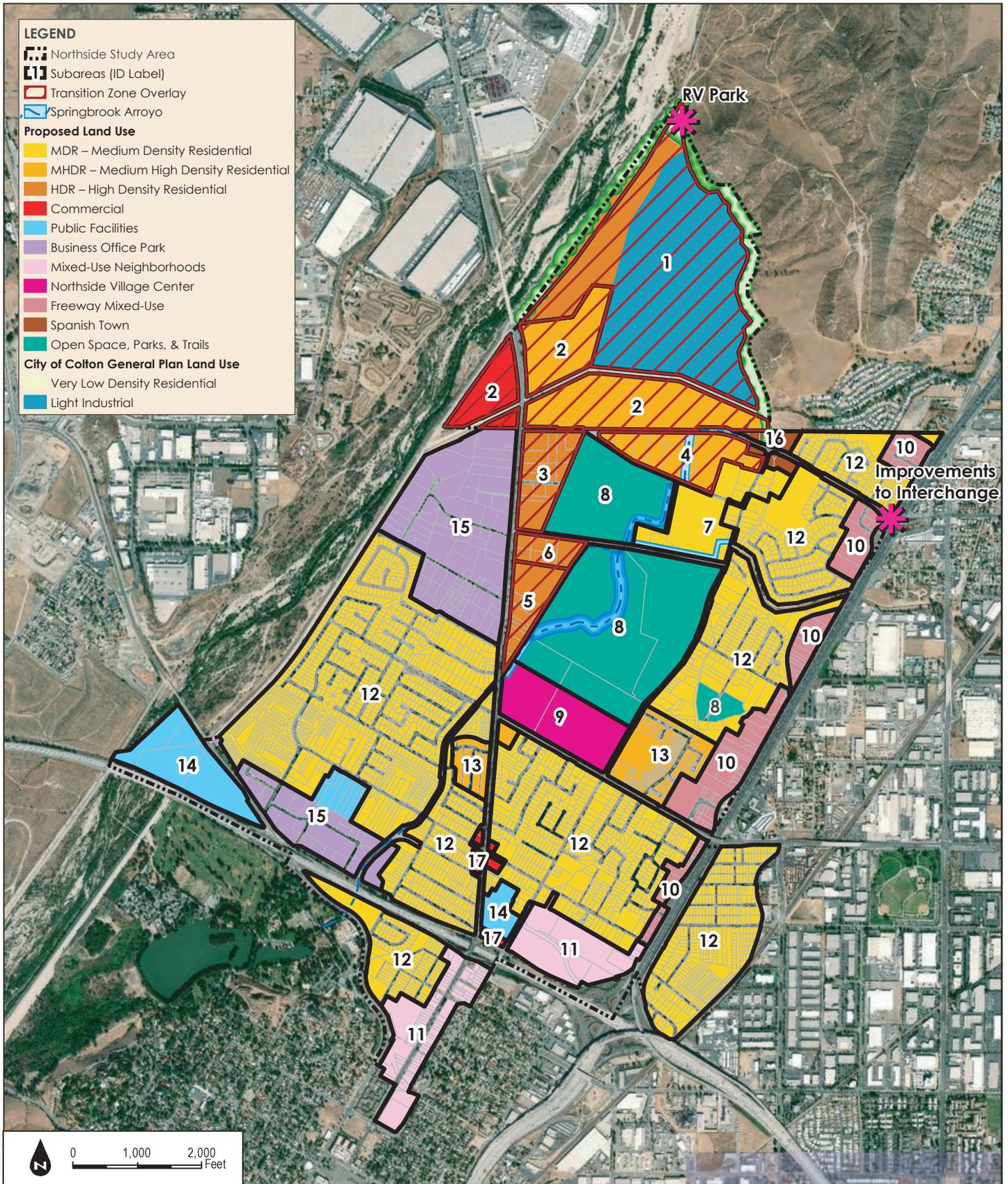
FIGURE 2
Topographic Map
Northside Specific Plan



SOURCE: ESRI World Imagery Baselayer; City of Riverside; City of Colton; County of Riverside; SANBA

FIGURE 3

Existing General Plan Designations
 Northside Specific Plan



SOURCE: ESRI World Imagery Baselayer; City of Riverside; City of Colton; County of Riverside; SANBA

FIGURE 4

Proposed Specific Plan Land Uses

Northside Specific Plan

Northside Specific Plan NOP Comment Letter Index May 16, 2019		
#	Commenter	Date
1	OPR	March 29, 2019
2	Airport Land Use Commission	April 2, 2019
3	Morongo Band of Mission Indians	April 2, 2019
4	March Joint Powers Authority	April 4, 2019
5	Marine Corps Installations West, Western Regional Environmental Coordination Office	April 16, 2019
6	Transition Properties, LP (Allen Matkins)	April 15, 2019
7	South Coast Air Quality Management District	April 16, 2019
8	Mark Dunham	April 17, 2019
9	West Valley Water District	April 17, 2019
10	Gil	April 18, 2019
11	Mary L. Hamilton Trust	April 25, 2019
12	City of Colton	April 25, 2019
13	Springbrook Heritage	April 29, 2019
14	SCAG	April 30, 2019
15	Northside Improvement Association	April 29, 2019
16	Inland Empire Biking Alliance	April 29, 2019
17	Lozeau Drury – Laborers International Union of North America	May 2, 2019
18	SoCalGas	May 6, 2019
19	Diana Ruiz	May 9, 2019
20	Northside Improvement Association	May 14, 2019



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Notice of Preparation

March 29, 2019

To: Reviewing Agencies

Re: Northside Neighborhood & Pellissier Ranch Inter-Jurisdictional Specific Plan
SCH# 2019039168

Attached for your review and comment is the Notice of Preparation (NOP) for the Northside Neighborhood & Pellissier Ranch Inter-Jurisdictional Specific Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

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

with a copy to the State Clearinghouse in the Office of Planning and Research at state.clearinghouse@opr.ca.gov. Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019039168/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Lead Agency



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Notice of Preparation

March 29, 2019

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If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Lead Agency

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

2019039168

Project Title: Northside Neighborhood & Pellissier Ranch Inter-Jurisdictional Specific PLan

Lead Agency: City of Riverside Contact Person: Jay Eastman
Mailing Address: 3900 Main Street, 3rd Floor Phone: (951) 826-5264
City: Riverside Zip: 92522 County: Riverside

Project Location: County: Riverside City/Nearest Community: City of Riverside

Cross Streets: Columbia Avenue at Main Street Zip Code: 92501

Longitude/Latitude (degrees, minutes and seconds): 34 °0 ' 24.65" N / 117 °21 ' 48.18" W Total Acres: 1700

Assessor's Parcel No.: See Attached Maps Section: Twp.: Range: Base:

Within 2 Miles: State Hwy #: I-215, SR-60, SR-90 Waterways: Santa Ana River

Airports: Flabob Railways: Amtrak/BNSF/Union Pa Schools: Fremont & Patricia Bel

Document Type:

- CEQA: [X] NOP [] Draft EIR [] Early Cons [] Supplement/Subsequent EIR [] Neg Dec [] Mit Neg Dec [] Other:
NEPA: [] NOI [] Draft EIS [] FONSI [] Joint Document [] Final Document [] Other:

State Clearinghouse stamp: Governor's Office of Planning & Research, MAR 29 2019

Local Action Type:

- [] General Plan Update [X] Specific Plan [X] Rezone [] Annexation
[X] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Division (Subdivision, etc.) [] Other:

Development Type:

- [X] Residential: Units Acres
[X] Office: Sq.ft. Acres Employees
[X] Commercial: Sq.ft. Acres Employees
[X] Industrial: Sq.ft. Acres Employees
[] Educational:
[X] Recreational:
[] Water Facilities: Type MGD
[] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[] Waste Treatment: Type MGD
[] Hazardous Waste: Type
[] Other: (See attached Project Description)

Project Issues Discussed in Document:

- [X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[] Agricultural Land [X] Flood Plain/Flooding [] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [] Minerals [X] Soil Erosion/Compaction/Grading [X] Growth Inducement
[] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [X] Other: Tribal Cultural

Present Land Use/Zoning/General Plan Designation:

See attached Project Description

Project Description: (please use a separate page if necessary)

See attached Project Description

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List

County: Pirnersider *af*

SCH# **2019039168**

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Denise Peterson
- California Coastal Commission
Allyson Hitt
- Colorado River Board
Elsa Contreras
- Dept. of Conservation
Crina Chan
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herota
- Office of Historic Preservation
Ron Parsons
- Dept of Parks & Recreation
Environmental Stewardship Section
- S.F. Bay Conservation & Dev't. Comm.
Steve Goldbeck
- Dept. of Water Resources
Resources Agency
Nadell Gayou

Fish and Game

- Depart. of Fish & Wildlife
Scott Flint
Environmental Services Division
- Fish & Wildlife Region 1
Curt Babcock
- Fish & Wildlife Region 1E
Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Drongesen
- Fish & Wildlife Region 3
Craig Weightman

- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M
William Paznokas
Marine Region

Other Departments

- California Department of Education
Lesley Taylor
- OES (Office of Emergency Services)
Monique Wilber
- Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- Dept. of General Services
Cathy Buck
Environmental Services Section
- Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division

Independent Commissions, Boards

- Delta Protection Commission
Erik Vink
- Delta Stewardship Council
Anthony Navasero
- California Energy Commission
Eric Knight

- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission
Supervisor
- Santa Monica Bay Restoration
Guangyu Wang
- State Lands Commission
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Cal State Transportation Agency CalSTA

- Caltrans - Division of Aeronautics
Philip Crimmins
- Caltrans - Planning
HQ LD-IGR
Christian Bushong
- California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

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Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Susan Zanchi
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Larry Newland
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- Caltrans, District 7
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Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Maureen El Harake

Cal EPA

- Air Resources Board
- Airport & Freight
Jack Wursten
- Transportation Projects
Nesamani Kalandiyur
- Industrial/Energy Projects
Mike Tollstrup
- California Department of Resources, Recycling & Recovery
Kevin Taylor/Jeff Esquivel
- State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control Board
Cindy Forbes - Asst Deputy
Division of Drinking Water
- State Water Resources Control Board
Div. Drinking Water # _____
- State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- State Water Resources Control Board
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control Reg. # _____
CEQA Tracking Center
- Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- RWQCB 1
Cathleen Hudson
North Coast Region (1)
- RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)
- Other _____

- _____
Conservancy

AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY



April 2, 2019

Mr. Jay Eastman, AICP, Principal Planner
City of Riverside Community & Economic Development Dept.
3900 Main Street, 3rd Floor
Riverside CA 92522

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County Administrative Center
4080 Lemon St., 14th Floor.
Riverside, CA 92501
(951) 955-5132

www.rcaluc.org

RE: AIRPORT LAND USE COMMISSION (ALUC) DEVELOPMENT REVIEW REQUIRED

Jurisdiction Project Case: Northside Neighborhood & Pellissier Ranch Specific Plan

Dear Mr. Eastman:

Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with a copy of the transmittal for the City of Riverside case; a proposal to establish the Northside Neighborhood & Pellissier Ranch Specific Plan.

ALUC staff has determined that the project is located within Compatibility Zone E of Flabob Airport Influence Area and within Compatibility Zone E of March Air Reserve Base/Inland Airport Influence Area, which does not restrict residential density or non-residential intensity, and also prohibits hazards to flights.

California Public Utilities Code section 21676 requires the local agency to refer any amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within an Airport Land Use Compatibility Plan (ALUCP) to the ALUC. Since the project contemplates amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation, the ALUC requests that you submit the above-identified project(s) for its review. ALUC staff is also available to assist in bringing your jurisdiction's General Plan into consistency with the applicable ALUCP, if the local jurisdiction so desires.

If you have any questions, please contact Paul Rull, ALUC Principal Planner, at (951) 955-6893.

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

Paul Rull, ALUC Principal Planner

Dawna Marshall

From: Eastman, Jay <JEastman@riversideca.gov>
Sent: Tuesday, April 2, 2019 3:49 PM
To: Michiko Mimi Morisaki; Dawna Marshall
Cc: Kopaskie-Brown, Mary; Brian Mooney
Subject: FW: [External] Northside Neighborhood and Pellissier Ranch Specific Plan and Program EIR

FYI.... NOP comment from Morongo Band of Mission Indians.

Thanks,

Jay Eastman, AICP

Principal Planner
City of Riverside
Community & Economic Development Department
Main: 951.826.5371
Direct: 951.826.5264
JEastman@RiversideCA.gov

From: Tribal Historic Preservation Office [mailto:thpo@morongo-nsn.gov]
Sent: Tuesday, April 2, 2019 2:57 PM
To: Eastman, Jay
Subject: [External] Northside Neighborhood and Pellissier Ranch Specific Plan and Program EIR

Hello Jay,

Thank you for the letter on the above referenced project.

The EIR will address an area that is sensitive for tribal cultural resources and, in the past, has been the focus of incomplete studies on the extent and patterning of these resources.

We look forward to reviewing the draft document.

Sincerely,

Travis Armstrong
Tribal Historic Preservation Officer
Morongo Band of Mission Indians
951-755-5259
Email: thpo@morongo-nsn.gov



MARCH JOINT POWERS AUTHORITY



April 4, 2019

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

RE: Notice of Preparation / Draft Program EIR – Northside Specific Plan (P19-0065)

Thank you for the opportunity to comment on the above aforementioned project. March Joint Powers Authority staff has completed their review of the **Notice of Preparation / Draft Program EIR for the Northside Specific Plan (P19-0065)**. While the proposed Northside Specific Plan area is not adjacent to the March Joint Powers Authority jurisdictional boundary, it is important the traffic analysis and Draft Program EIR also consider State Route 60. The March Joint Powers Authority have no further comment at this time. Please let us know when the Draft Program EIR for the Northside Specific Plan is available for public review and comment.

If you have any questions regarding our comments or need additional information, please feel free to contact me at (951) 656-7000, or by email at, smith@marchjpa.com. Thank you.

Sincerely,

Jeffrey M. Smith, AICP
Senior Planner
March Joint Powers Authority

RECEIVED
APR 9 2019
Community & Economic
Development Department

Dawna Marshall

From: Hamilton CIV Charles M <charles.hamilton@usmc.mil>
Sent: Tuesday, April 16, 2019 10:33 AM
To: Eastman, Jay
Subject: [External] Response for Notice of Prep EIR (P19-0065)

Mr. Eastman

Received notification for EIR for Riverside project P19-0065 for Marine Corps Installations West, Western Regional Environmental Coordination Office.

MCIWest WREC has NO comments for the undertaking. Project has NO impact to Marine Corps operations.

Just received via our mail today 16 April (processing is glacially slow) routing even though postmark is 28 March).

Thanks and continued good luck there.

Mike Hamilton
Marine Corps Installations West G-7
Environmental Plans
(760)725-2635

Allen Matkins

Allen Matkins Leck Gamble Mallory & Natsis LLP
Attorneys at Law
1900 Main Street, 5th Floor | Irvine, CA 92614-7321
Telephone: 949.553.1313 | Facsimile: 949.553.8354
www.allenmatkins.com

Andrew Lee
E-mail: alce@allenmatkins.com
Direct Dial: 949.851.5484 | File Number: 376839-00001/OC1216468

Via Email/U.S. Mail

April 15, 2019

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

E-mail: jeastman@riversideca.gov

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

Dear Mr. Eastman:

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

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

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

Allen Matkins Leck Gamble Mallory & Natsis LLP
Attorneys at Law

Jay Eastman, AICP, Principal Planner
3900 Main Street, Third Floor

April 15, 2019

Page 2

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

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

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

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

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

Very truly yours,



Andrew Lee

AL

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

Allen Matkins

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Andrew Lee
E-mail: alee@allenmatkins.com
Direct Dial: 949 851 5484 File Number: 376839-00001/OC1192779

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
Kevin D. Foust, Ward 2
Elizabeth Sanchez-Monville, Ward 3
Andrew Wacker, Ward 5
Jeanette Hernandez, Ward 6
Gil Ocegueda, Ward 7
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).¹ As City staff have recognized, the proposed Specific Plan cannot prohibit Transition Properties' Project, as its entitlements were submitted well over two years before the City started work on the Specific Plan (Project submitted in December 2014 and first work on Specific Plan in January 2017). See Planning Commission Memorandum (Apr. 5, 2018), p. 5. But, the proposed Specific Plan would still make the Project nonconforming – severely diminishing its market value. This is despite the City's promise when annexing the Property that it would be zoned industrial.



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

¹ However, it should be noted that the 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



South Coast Air Quality Management District

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

SENT VIA USPS AND E-MAIL:

April 16, 2019

jeastman@riversideca.gov

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

Notice of Preparation of a Draft Environmental Impact Report for the Proposed Northside Specific Plan

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the Draft EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

On March 3, 2017, the South Coast AQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board 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. 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. The 2016 AQMP is available on South Coast AQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. South Coast AQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on South Coast AQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

South Coast AQMD has also developed both regional and localized air quality significance thresholds. South Coast AQMD staff requests that the Lead Agency compare the emissions to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the Draft EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the Draft EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading,

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

If the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Project, including:

- Chapter 11 "Mitigating the Impact of a Project" of South Coast AQMD's *CEQA Air Quality Handbook*
- South Coast AQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- California Air Pollution Control Officers Association's (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

If the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR (CEQA

Guidelines Section 15381). For more information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling the South Coast AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the South Coast AQMD's webpage (<http://www.aqmd.gov>).

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and mitigated where feasible. Please contact me at lsun@aqmg.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC190404-04

Control Number

Dawna Marshall

From: Eastman, Jay <JEastman@riversideca.gov>
Sent: Thursday, April 18, 2019 11:29 AM
To: Michiko Mimi Morisaki; Brian Mooney; Kurt Culbertson
Cc: Dawna Marshall; Robert Stockton; Kopaskie-Brown, Mary
Subject: FW: [External] Comment for Northside Plan

Mimi, Brian and Kurt,

Please see comment below.

Mr. Dunham had attended the Scoping Meeting yesterday and expressed his desire to move throughout the Northside using a Neighborhood Electric Vehicle (NEV). Specifically, he wanted to get from his house, which is east of Reid Park, to the Northside Village Shopping Center... and expressed concern that he cannot drive a NEV on Columbia Avenue.

Thanks,

Jay Eastman, AICP

Principal Planner
City of Riverside
Community & Economic Development Department
Main: 951.826.5371
Direct: 951.826.5264
JEastman@RiversideCA.gov

From: Eastman, Jay
Sent: Thursday, April 18, 2019 11:22 AM
To: 'Mark Dunham'
Subject: RE: [External] Comment for Northside Plan

Thank you Mark for your thoughts. I will share this with the project team.

Thanks,

Jay Eastman, AICP

Principal Planner
City of Riverside
Community & Economic Development Department
Main: 951.826.5371
Direct: 951.826.5264
JEastman@RiversideCA.gov

From: Mark Dunham [<mailto:Mark@dunhamhvac.com>]
Sent: Wednesday, April 17, 2019 6:50 PM
To: Eastman, Jay
Subject: [External] Comment for Northside Plan

Jay,

My comment is about Low Speed Vehicles or LSVs. They look like golf carts but they have street legal requirements such as VIN numbers, license plates headlights and turn signals. Like the Gem or Ford Neighborhood Think.

I would like to see a way for us northsiders to get around without using fossil fuels. Can we have streets for LSVs? More specifically from Orange street to Main St shopping.

Thank you
Mark Dunham

Sent via the Samsung Galaxy Note9, an AT&T 5G Evolution capable smartphone

Dawna Marshall

From: Daniel Guerra <dguerra@wvwd.org>
Sent: Wednesday, April 17, 2019 11:53 AM
To: Eastman, Jay
Subject: [External] Northside Specific Plan (P19-0065) - City of Riverside

Jay,

Thank you for the opportunity to review the Northside Specific Plan Project.

The identified area is outside of the West Valley Water District Service boundary and Sphere of Influence. The District does not provide water service nor does it have any facilities within the project area.

Should you have any questions, please feel free to give me a call.

Thanks,

Daniel Guerra

Engineering Development Coordinator
West Valley Water District | Engineering Department
855 W. Base Line Rd | P.O. Box 920 | Rialto, CA 92377
P: 909-875-1804 ext. 373 | E: dguerra@wvwd.org

Dawna Marshall

From: Eastman, Jay <JEastman@riversideca.gov>
Sent: Thursday, April 18, 2019 3:18 PM
To: Michiko Mimi Morisaki; Brian Mooney
Cc: Dawna Marshall; Kurt Culbertson; Kopaskie-Brown, Mary; Robert Stockton
Subject: FW: [External] Ideas for Northside Specific Plan

Mimi and Brian,

FYI... An additional comment from someone that attended the Scoping Meeting last night. Neither comment is related to the PEIR.

Thanks,

Jay Eastman, AICP

Principal Planner

City of Riverside

Community & Economic Development Department

Main: 951.826.5371

Direct: 951.826.5264

JEastman@RiversideCA.gov

From: Gil & Larissa [mailto:larissaoceguera@gmail.com]
Sent: Thursday, April 18, 2019 3:05 PM
To: Eastman, Jay
Subject: [External] Ideas for Northside Specific Plan

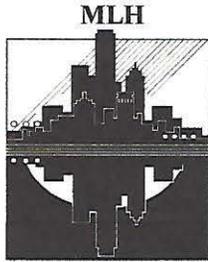
I attended the Northside Specific Plan Meeting last night.

Here are some ideas you may consider as you go forward with this project:

1. Movie Theater
2. Along with food shops/restaurants and grocery stores, you should add an outdoor stage in a park like setting for people to play music and or have venues during the evenings/weekends. A gathering place for families around the shopping areas.

Thanks

Gil



Mary L. Hamilton Trust
3940 San Gregorio Way, San Diego, CA 92130 (858)720-0166 office * (858)720-9630 fax

TOWN SQUARE
MURRIETA- Walgreens
RIVERSIDE 22Ac
RIVERSIDE - Retail
Citracado Circle-SFR
Nashville, TN-Comm
UTAH ACREAGE

April 25, 2019

City of Riverside
Mayor's Office- Rusty Bailey
3900 Main Street
Riverside, CA 92522

Mr. Jay Eastman
City of Riverside
3900 Main Street
Third 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 MacArthur- Ward 5
Jim Perry- Ward 6
Steve Adams- Ward 7
3900 Main Street
Riverside, CA 92522

VIA REGULAR MAIL AND ELECTRONIC DELIVERY

RE: Northside Specific Plan EIR Scoping Meeting—Comment Letter from Private Ownership
APN: 246-092-010 and 246-070-005 – 575 N Orange Avenue, Riverside, CA
Collectively 22Ac Vacant Land

Dear Honorable Mayor, City Council Members and Planning Division;

I am writing this letter as private property owner for the above referenced property which is located within the Northside Specific Plan boundaries.

I was recently made aware by my real estate broker that the City of Riverside held an open meeting on April 17, 2019 to invite the public to learn about some proposed land use changes. Such notice was published in your handout dated March 29, 2019. As a property owner whose real estate falls within the City's notice radius, I am advising the City and Project Team that they failed to properly notice the ownerships of such meeting. The April 17th Meeting was outlined and advertised as "the basis for the environmental impact report and that such "decision-makers" would have an opportunity to consider the environmental impact report and such criteria prior to the project approvals". **As the second largest parcel owner** outside of the Riverside Controlled Properties, I was completely unaware of the City's intention to continue with their blueprint or Northside Specific Plan which is really a re-zoning plan for the area. This greatly will impact my real estate holdings and any development plans I may have in the future.

On April 2018, I signed an exclusive listing agreement with Lee and Associates Commercial Real Estate Services to sell the vacant 22Ac parcel(s) recognizing that this economy has hit an all-time high for industrial property with many users still looking for opportunities to create high economic impacts in the area. The brokers identified in their marketing strategy an approach to market the property not only to industrial developers but also to expose the property to residential developers and seek their assessment of the property. At such time, we were notified that the City Staff wanted to consider residential development in our area and suggested we look at this opportunity as well as industrial opportunities as its current zoning allows.

With the concluded City Council Approval of the Transition Properties LP Project located across the street from my real estate parcels, I continued to market the property and have received a bona fide Letter of Intent from a reputable developer that we are currently negotiating terms to develop a light industrial park which is an allowed use in the current zoning. I believe not only the Transition Properties LP Project but any project we bring forth to the City for

approvals will meet the City's current zoning standards and it will uniformly enhance this underutilized area where we are currently located.

For historical purposes, the City has a requirement under its General Plan to allow industrial land in the specific area, that was one of the main reasons why the City could annex this area away from the County and into the City boundaries many years ago. Moreover, the annexation was overwhelmingly supported by the Northside Community and the property owners at the time because of the higher and best use of the newly proposed zone of the surrounding area in general and the hope that the City would bring the infrastructure improvements that were neglected by the County to support the development of the entire area. Per the General Plan, it strictly prohibits the City and limits their ability to re-designate or rezone land from an industrial use. In other words, by continuing to proceed with the Northside Neighborhood Specific Plan as proposed by the City and Project Team under an expensive and timely Environmental Impact Report ("EIR") the re-zoning efforts does not adhere to its General Plan and acting in an unlawful manner without going through all the proper governmental processes and procedures (i.e. amendments to general plan) to facilitate any kind of area change.

The vacant 22Ac is currently underutilized and has been for decades. As an owner, I understand the business cycle and now is the time to sell the land, turn it over to a developer who can bring these improved assets to the community. I have spent many years waiting on the City to decide what kind of development they wanted for the area. I can go back to July of 2015, DAUM (Brokerage) presented me with an acceptable offer from an industrial developer to purchase the land and in August 2015 I had an executed Letter of Intent spelling out the terms and conditions for that sale. Shortly thereafter and within the prospective buyer's due diligence period our broker along with the prospective buyer met with City representatives and Councilman Mike Gardner. At this specific meeting the City discouraged the prospective buyer/developer from any kind of industrial development as the City would not support the current zoning allowed uses under the General Plan. The City disclosed the likelihood of a zoning change. The Northside Specific Plan has been underway for several years. The City has spent an enormous amount of time and money on consultants to work with the residents and businesses alike. Even back then those consultants failed to meet with the actual property owners who own sizeable/developable land within the Northside Specific Plan boundaries. As one of those owners, neither my sister nor I were contacted by the City's consultants to seek our opinion to this Specific Plan and I find it unacceptable and a loss of our property rights.

Per an article written on March 3, 2018 by the Press Enterprise regarding the Northside Specific Plan and Transition Properties LP Project, City staff members are quoted as saying, "*They are only midway through developing a blueprint, called the Northside Specific Plan.*" Such a blueprint is not necessarily a zone change as that would require further time and money to follow all governmental policies and procedures such as amendments to General Plan and a full EIR study. All this time is adding up; We started June 2015 with a so-called City Temporary Moratorium Initiative which was a blatant abuse of government power by clouding any real property owner with the possibility of entertaining any offer to sell knowing of a possible zone change to be forthcoming. Apparently, in August of 2015, an interim ordinance establishing a "temporary moratorium on land use entitlements and building permits for zoned BMP areas was set for an initial period of no longer than 45 days. The City Attorney's office made the determination that this was an unlawful action and suggested the City Council not pursue such an action. However, as it seems since then an apparent silent "interim moratorium" has taken place without any formal proceedings and stopped any real property owners from selling or developing their own property. More importantly, this action has cast a negative financial impact on all property owners in the area. The City has taken our property rights away via an inverse condemnation action which is highly challengeable in a court of law.

I have been advised that the highest and best use of the property is to remain as an industrial development. Although the current "by right" zoning allows for a 400,000 sq. ft facility (most profitable to a developer) the City has taken the stance not to allow/support that kind of development under their own ordinance codes. Rather, small business park building development for an industrial use is the next best design and still retains much of the property's value. After analyzing the residential development scenario as forecasted in the EIR as a project alternative zoning use, that use has been estimated **to decrease the current value by approx. \$4M**. To some that maybe small change, but to this ownership(s) that is a substantial loss of value that the City has invoked upon on my property rights. I adamantly oppose any change to the current zoning for which my property falls within.

The Scoping Meeting held on April 17th also mentions a Transition Zone Overlay or "TZO" that would cover the land uses for Subareas 1 through 6; however, per the City Plan, my property is Subarea 7 just adjacent to subareas 1-

6 does not fall within the TZO and clearly discriminates my opportunity to continue to operate under the B/OP land use designation, which is similar to the existing zoning; or develop the property per the proposed base zone designation. I find this to be unacceptable by the City to consider as a private female property owner my loss of land use rights. Furthermore, the Project Overview encompasses four independent jurisdictions, to my knowledge none of these jurisdictions have officially signed on to the proposed Northside Neighborhood Specific Plan concept and approved its entire merits.

In conclusion, the Northside Project Alternatives break up into four (4) evaluations:

1. No Project-No Build; I can support that alternative
2. Only the Springbrook Heritage Parklands & Walking Trails Plan (for which I oppose if it includes my property);
3. Examine additional land use changes on only the Riverside controlled properties which is approx. 406 Ac Project – clearly enough land to create its own independent development and I will support;
4. A hybrid of land uses identified in the proposed project that could reduce environmental impacts. I oppose any land use change as it affects my real estate owned holdings.

I would welcome a meeting with the City and Project Team to discuss their vision and see how we can work together to develop the most attractive project(s) that reduces our environmental impacts in the future and allows a clear path to continue to market and sell my property in a timely manner.

Sincerely,



Mary L. Hamilton
(858) 720-0166 office
(858) 720-9630 fax
Hamilton.mar@sbcglobal.net

Cc: Jeff Ruscigno, Lee and Associates
Matt Weaver, Lee and Associates
Sarah Garner, GM Trust



April 25, 2019

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

SUBJECT: Notice of Preparation – Northside Specific Plan EIR

Dear Mr. Eastman:

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

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

Project Description

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

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

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

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

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

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

Circulation

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

Water Quality/Flooding

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

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

Biological Resources

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

Cultural Resources

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

Mineral Resources

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

Aesthetics

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

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

Land Use

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

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

Sincerely,



Mark R. Tomich, AICP
Development Services Director

- C: Bill Smith, City Manager
David Kolk, Public Works & Utilities Director
Hye Jin Lee, Assistant Public Works & Utilities Director
Victor Ortiz, City Engineer
Art Morgan, Economic Development Manager

Dawna Marshall

From: Michiko Mimi Morisaki <mmorisaki@rickengineering.com>
Sent: Monday, April 29, 2019 5:02 PM
To: Dawna Marshall; Carey Fernandes
Cc: Eastman, Jay; Brian Mooney
Subject: FW: NORTHSIDE SPECIFIC PLAN DRAFT EIR -- COMMENTS FROM SPRINGBROOK HERITAGE ALLIANCE
Attachments: 2014 SHA Park Plan 2017-08-15 001 map.pdf; SHAparkproposal.pdf

Hi Dawna and Carey,

We just received the email below and its attachments from SHA.

Thank you,
Mimi

Michiko (Mimi) Morisaki, AICP, LEED Green Associate

ASSOCIATE COMMUNITY PLANNER

RICK ENGINEERING COMPANY

5620 Friars Road / San Diego, CA 92110

t 619.291.0707 / d 619.688.1490 / f 619.291.4165

mmorisaki@rickengineering.com / www.rickengineering.com



WARNING: The information provided via electronic media is not guaranteed or warranted against any defects, including design, calculation, data translation or transmission errors or omissions.

From: Karen Renfro [mailto:k.a.renfro7@gmail.com]

Sent: Monday, April 29, 2019 4:57 PM

To: Jay Eastman; Brian Mooney

Cc: Murray, David; Joan Isaacson; Richard O'Neill; Brian Stephenson; Michiko Mimi Morisaki; Eva Yakutis; Kopaskie-Brown, Mary; Brenes, Patricia; Welch, David; Springbrook Heritage Alliance; Wohlgemuth Family; erin snyder; Nancy Melendez; Marisa Yeager

Subject: NORTHSIDE SPECIFIC PLAN DRAFT EIR -- COMMENTS FROM SPRINGBROOK HERITAGE ALLIANCE

SPRINGBROOK HERITAGE ALLIANCE

*Saving the treasures of the Springbrook Arroyo Watershed
for the benefit and pleasure of the people*
RIVERSIDE - COLTON - HIGHGROVE - GRAND TERRACE

April 27, 2019

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

Dear Mr. Eastman:

Springbrook Heritage Alliance wishes to enter our comments into the record for the Draft Northside Specific Plan EIR scoping process. We are glad to see that our Springbrook Heritage Parklands & Walking Trails plan is to be included as an Alternative. As it has many dimensions that cannot be discerned by looking only at the map, we hope you will afford us an opportunity to present it in its entirety to your team--something we've never had an opportunity to do. The map and outline of our plan are attached below.

We also wish to express our unhappiness that the much of the NSP as now envisioned is still inappropriate for the neighborhood:

AESTHETICS:

The charm of the Northside is its rural character in an urban setting. This should not be destroyed by new development, and doesn't need to be. La Loma Hills close by across the county line is a local landmark and should not be blocked by oversized buildings. The area below Orange Street and the rear boundaries of the businesses on Main between Columbia and north to the county line, currently in use as open space public recreational facilities or vacant lots, includes Reid Park which is a jewel in the crown of the City's public parks. It is adjacent to the Cross Country Course and Ab Brown Sports Complex which have not suffered from urban development because they are unsuitable for most kinds of projects. These green open spaces should be saved as community treasures and not "upgraded" with unnecessary modern amenities. There is a way they can contribute to an economic renaissance in the Northside, but not as a mini-Orange County community. Springbrook Heritage Parklands & Walking Trails proposes a plan that would do that.



Photo by Stacy Mullaney

View of the Santa Ana River flood plain looking north from Orange Street near the Springbrook Arroyo.

AIR QUALITY:

Currently, air quality in the Northside is not so good. It could be better IF the above-mentioned open spaces remain green and undeveloped. The old Riverside golf course used to have 800 trees before most of them died or had to be removed because of disease caused by lack of water. It is now in use as California's most popular CIF Cross Country Course whose events draw ten thousand people to Riverside annually. It could be a public or private drought-resistant native Arboretum with the Cross Country courses winding through a recreated urban forest (at one time it was dense with willows and Agua Mota)--something we believe would enhance its value to the community, to Riverside, and to Southern California. All it would need is a sturdy new old-fashioned looking fence (paid for by community fundraisers); crushed granite for the running course, walkways and vehicle access roads; some clean-up and restoration of the ponds; and more trees and shrubbery and wildflowers (to be donated by individuals and organizations, planted by volunteers under the supervision of the City's arborist. Pellissier Ranch could be re-used as a working 19th-century farm, a historical park that would need to be planted with various fruit and shade trees typical of the period. The trees at all these sites would clean the air, generate oxygen, sequester rainwater, provide food and housing for birds and other beneficial wildlife, and so forth. The green of the trees and the native groundcover would create a serene and pleasant vista for the neighborhood, and contribute to a better quality of life.

BIOLOGICAL RESOURCES:

At this time, Reid Park, Pellissier Ranch, the Cross Country Course, Springbrook Arroyo and other seasonal waterways provide room for trees, shrubbery and groundcover that attract wildlife. Encouraging native plants typical of this area would help secure these places as stable environments for various species and enhance property values in the neighborhood.

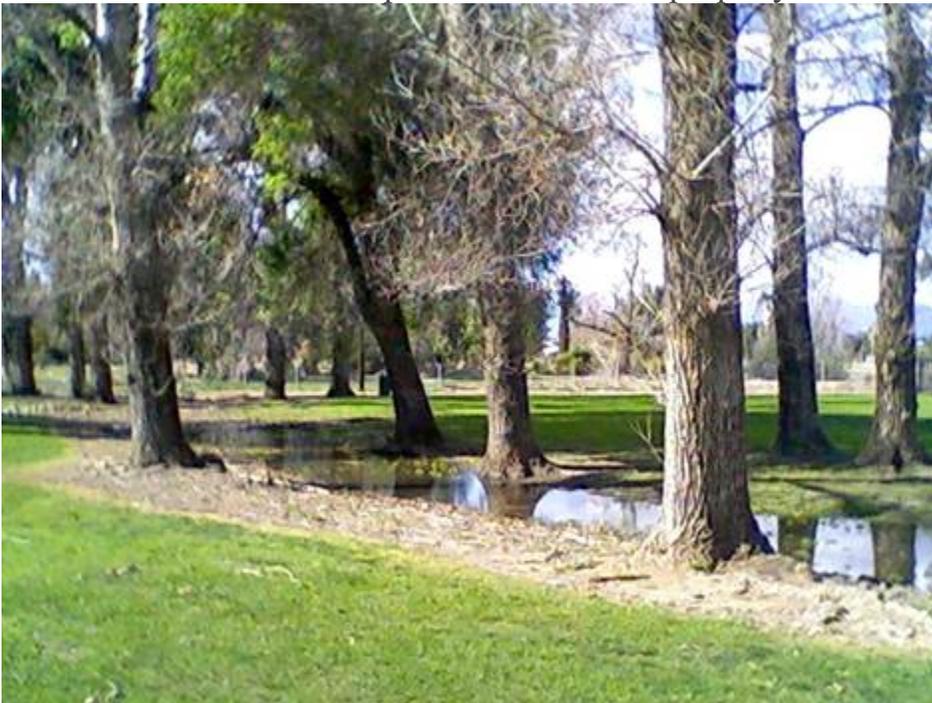


Photo by Jim Wood

Reid Park where a seasonal creek crosses Orange Street on its way to the Cross Country Course and Springbrook Arroyo.

CULTURAL RESOURCES:

It is imperative that the NSP Team pay attention to the chronical of history unique to this neighborhood. It began when the First People came to live here thousands of years ago. It continued through occupation by Cahuilla, Tongva, Serrano, Luiseno and other tribes until about 175 years ago. They left artifacts on La Loma Hills, including petroglyphs that may have served as sacred symbols for female fertility rites. They would have hunted, fished, gathered plants for food and materials for baskets, bathed and perhaps had their winter homes on the high ground here. Because the flood plain was dotted with hot springs, sulphur springs, cold springs back then in addition to the Arroyo, and aquifers and vernal pools during the rainy periods that even today attract waterfowl and wildlife, the presence of the fertility symbols on La Loma Hills suggests that the native peoples considered this area sacred. Which means it was a place of peace to them where even if they encountered an enemy tribe they would not show hostility. Spanish colonists began settling this area in the early 1800's, and people of many cultures began settling here after Mexican Independence--among them the *Genizaros* from Abiquiu, New Mexico, who in 1844 founded the little villages of La Placita & Agua Mansa where the River meets La Loma Hills. The remains of their adobe houses and irrigation ditches lie beneath the soil on Pellisser Ranch and surrounding environs. After Riverside was founded to the south, more people came and some of the little farms were subdivided to provide small lots for the homes of workingmen--a characteristic shoebox-shaped one-story dwelling made of adobe, wood or brick that would fit in the resulting narrow strip of land. In 1905 Antoine Pellissier of France arrived, and began buying up acreage for his dairy and vineyards. Each successive layer of newcomers brought their own contributions to the neighborhood, and settled peaceably--a legacy that remains in the tranquility of the neighborhood despite the traffic on surrounding streets and freeways. The histories are still being written, and much of value comes from the families whose origins go back to the early days of settlement. The history of the Northside is in the people, and all over the ground, beneath your feet, buried in the soil. We recommend that everyone on the NSP Team read Joyce Carter Vickery's *Defending Eden* (UCR History Dept. and Riverside Municipal Museum, 1977).

This is a copy of a map drawn by Salvador Alvarado. Mr. Alvarado was born in La Placita in 1886. He drew this map, from memory, in about 1977 when he was 85 yrs. c



Salvador Alvarado's 1977 map of La Placita de los Trujillos ca. 1900. The village was established in 1844 and was absorbed by the Pellissier Ranch in the early 20th Century. Map from Riverside Metropolitan Museum Archives

GEOLOGY/SOILS:

There is no legitimate reason to propose any type of housing or intense urban or industrial development in the Santa Ana River Flood Plain or the tableland above it to the east. The bottomland is unstable because it is subject to flooding from rainfall run-off and subsidence under certain conditions. The Riverside General Plan 2025 shows it as a high-risk area for liquefaction. There are fracture zones all over the place and the San Jacinto Fault is only a few miles away. 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 Flood of 1862 was of greater magnitude than that. The tableland is now almost entirely developed with single-family houses. That is because after the Flood of 1862 few people were foolhardy enough to build homes below Orange Street. It doesn't take a cataclysmic flood for rainfall runoff waters to come all the way up to the Ruth Lewis Community Center at Reid Park--which is stationed only a few yards from Orange.

HYDROLOGY/WATER QUALITY:

Because much of the Northside is in the Santa Ana River flood plain, subject to flooding from rainfall run-off, and underground water reservoirs are part of the City's water supplies, it is important to understand how hard, perhaps impossible, it will be to keep new development on the flood plain from being inundated several times a year, even during periods of drought, by

flooding. Instead of having to mitigate such problems with ugly basins and concrete channels, why not take advantage of that water by sectioning off an area for a community garden and outdoor farmer's market? This would be in addition to encouraging small-scale entrepreneurs to start new neighborhood businesses based on the heritage of the old Spanish Town neighborhood. These would enhance the separate creation of the Trujillo Adobe Cultural Center. In this way, all new buildings could be designed to look like 19th Century southwestern-style houses and shops (these would be reminiscent of the Estudillo Adobe in Old Town San Diego) with crushed granite yards to minimize dust, mud and provide a permeable solid surface during rainy periods. As much as possible, these buildings could be nestled among shade trees and have small yards for greenery to help lower temperatures on hot days. This would help to keep water from running off, and the sequestered water would be filtered naturally as it seeped through the soils to the reservoirs. The more greenery, the cleaner the water. And some businesses could be involved in growing and selling "kitchen garden" produce and products to neighborhood restaurants, the local population and tourists.



Photo by Jim Wood

Springbrook Arroyo at Orange looking east during a rainstorm. The muddiness is caused by silt from a poorly-executed brush removal project below W. La Cadena Drive several years ago. If the arroyo was restored the silt would be removed and it could handle a greater volume of water.

GREENHOUSE GAS EMISSIONS:

Rather than encourage industrial, commercial and large-scale residential projects which would increase greenhouse gas emissions, why not encourage protection of our precious local public recreational facilities as undeveloped open space? This would mean more trees and shrubbery that would clean the air instead of pollute it. Our Parklands Proposal is a plan that would allow for the most economically advantageous investment in the Northside possible without creating problems for the environment. The people who live and work in the Northside would be a lot happier without incompatible operations that are not good for people to live around.



Photo by Jim Wood

View of the San Gabriel Mountains from Reid Park at Garner Road with flood plain in the foreground.

HAZARDS & HAZARDOUS MATERIALS:

The current Draft NSP EIR places new single-family residential projects on Center Street across from existing industrial development, and new multi-family residential buildings on Main adjacent to and across from existing commercial/industrial development, some which do handle toxic materials. This makes no logical sense. There is no way to mitigate such inconvenience to the business operations and exposure to new residents who would also have to deal with flooding from rainfall runoff.

LAND USE/PLANNING:

Property rights are reciprocal, meaning that business and homeowners have a right to the protection of their properties from harm by new development. The rights of real estate speculators and developers do not take precedence over those who are already here. However a site is zoned, new development should always be beneficial to the neighbors and the neighborhood.

NOISE:

The noise generated by the new development proposed by the Draft NSP would degrade the Quality of Life in the Northside. The old section of the Northside does not have to be the subject of intense development to generate new jobs and appropriate neighborhood amenities.

POPULATION/HOUSING:

No new housing should be built anywhere in the flood plain below Orange Street. There are still undeveloped parcels above Orange Street that could be developed for housing. But the Northside is not a good area for more high-density housing unless it is a senior housing project.

PUBLIC SERVICES:

New offices should be restricted to Main Street, not sprinkled around in the residential or recreational areas. A branch library would be a welcome addition to the neighborhood. It should be located above Orange Street out of the flood plain, perhaps near Fremont Elementary School at Orange and Strong.

RECREATION:

Save what we have now: Protect Reid Park, do not relocate the Ab Brown Sports Complex onto the Cross Country Course. Make the old golf course a permanent public or private open space where Cross Country competitions, special events sponsored by organizations that need a large venue with lots of greenery and no modern amenities, and allow public access during daylight hours when not in use by the other groups. This would bring revenue to the City, increase walk-in trade with local neighborhood merchants, boost patronage at nearby hotels and motels, create a customer-base for local Spanish-Town themed restaurants and other businesses that cater to tourists and cultural and historical groups.



Photo by Jim Wood

Springbrook Arroyo from Main Street looking northeast toward La Loma Hills with the Cross Country Course on the right.

TRANSPORTATION:

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 street-car style busses would be a better fit as the routes and schedules could be more flexible throughout the day, the week and the year. To be viable, bus stops must be placed at intervals of no more than half a mile away from people's

homes. The stops should be kept clean and well-lit at night. Service needs to run almost round-the-clock. Otherwise it cannot be used by many riders to get to work and home again. This means people will prefer to use their own private vehicles to get around for a long time. Traffic controls should take this into consideration. Also, that there is a lot of foot traffic in the Northside. That means pedestrian crosswalks across Orange, Columbia, Main, Center, and all side-streets are essential. These serve as additional visual warnings to motorists who sometimes have a hard time seeing pedestrians unless they are crossing within a crosswalk.

TRIBAL CULTURAL RESOURCES:

Because the Northside's history has been so neglected for so many generations, the public record does not show much in the way of resources that can be studied. But, because La Loma Hills has known artifacts, and artifacts were found in 1870 at the place we call Elliotta Hot Springs on Strong--now a senior housing project--and from time to time Northsiders discover arrowheads or manos in their backyards, and the main roads through the neighborhood that we travel on now were once native footpaths, we should reconsider what we think we know. The Springbrook Arroyo, La Loma Hills and Fairmount Park are all part of a special place native Americans would have considered sacred. That this place has been overlooked by local Indian tribes is not an indication there is nothing of value here worth saving. Original research and studies need to be undertaken, otherwise new development will most certainly destroy a precious heritage that belongs not just to the descendants of generations past, but to all of us in our own time.



Photo by Jim Wood

Springbrook Arroyo as it passes through Fairmount Park. It once flowed beneath Mt. Rubidoux where a band of Cahuilla exiles lived in their camps on the hillsides from about 1870 to 1900. They were forced to leave by real estate developers who were building road to serve the new homes on what is now Indian Hill Drive. Before the park was established and Lake Evans constructed, this area was known as "Springbrook Meadows".

UTILITIES/SERVICE SYSTEMS:

These should be maintained regularly, repaired immediately when they break down. New services should not intrude on the residential, recreational, retail, commercial, institutional areas of the neighborhood.

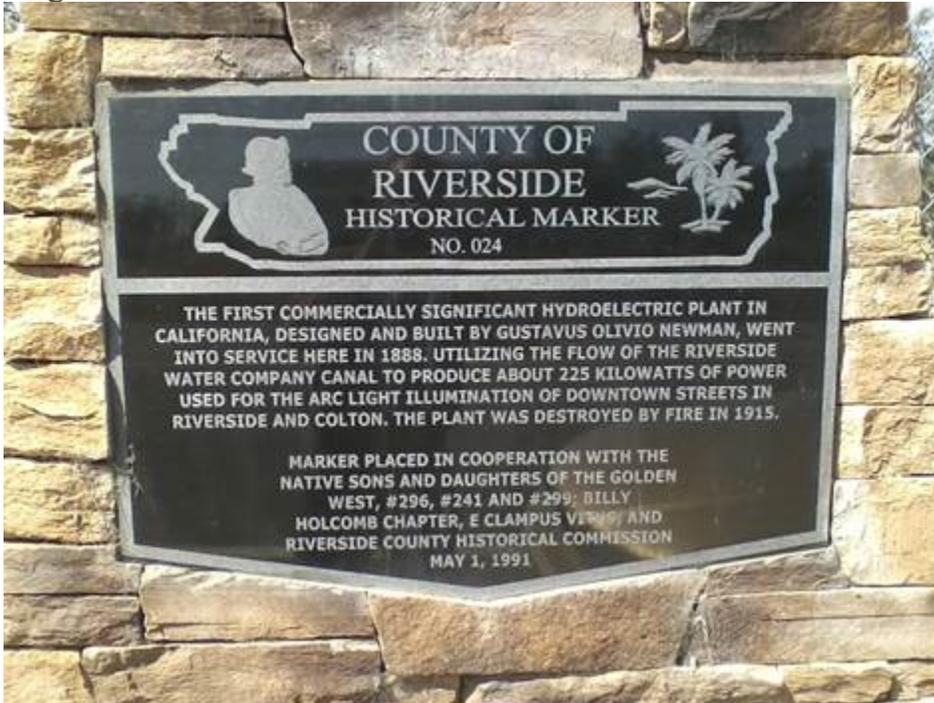


Photo by Jim Wood

Historical marker for one of the treasures of the Springbrook Arroyo Watershed and Northside.

PROJECT ALTERNATIVES:

As our plan for Springbrook Heritage Parklands & Walking Trails, first adopted by Springbrook Heritage Alliance in 2014, is included in the Draft NSP EIR, we will not go into detail here. But, we would like to emphasize there is a difference between our proposed Old Spanish Town Village District (the area bounded by Columbia, West La Cadena Drive, La Loma Hills and the Santa Ana River) and the Spanish Town Village proposed by the Northside Specific Plan (the immediate area around the Trujillo Adobe--an area our plan shows as a restored Trujillo Adobe, museum and cultural center). Our purpose is to save the treasures of the Springbrook Arroyo Watershed, establish a new land use policy that benefits the people who are already here and creates a framework for small-scale private-sector development based on the Northside's unique and diverse heritage. Highlights from our Parklands & Walking Trails include:

- The historic Trujillo Adobe & related sites
- Riverside Championship Cross Country Course
- Ab Brown Sports Complex
- Pellissier Ranch, site of original La Placita de los Trujillos, and Pellissier Dairy and Winery
- La Loma Hills, site of native artifacts
- Springbrook Arroyo, Springbrook Falls, Springbrook Meadows
- Former dairy farm sites, pastureland, alfalfa fields, etc.
- Trujillo Ditch
- Connections to San Salvador de Jurupa, the Old Spanish Trail, the Santa Ana River Parkway, Highgrove, Hunter Park, Blue Mountain, Mt. Rubidoux, Box Springs Wilderness Park, the Mission Inn, & more...



Photo courtesy of Spanish Town Heritage Foundation

The Bell of San Salvador, made famous by Joyce Carter Vickery's history of La Placita de los Trujillos and Agua Mansa, Defending Eden: New Mexican Pioneers in Southern California 1830-1890 (UCR History Dept. and Riverside Municipal Museum, 1977). The bell in the picture is a replica of the original, and is now part of Frank Miller's collection, housed in the garden at the Mission Inn.

CUMULATIVE IMPACT ANALYSIS:

These should include the massive logistics centers proposed for or being built in Moreno Valley, Bloomington, Fontana, and elsewhere in the region. They should be considered in relation to their effect on the Quality of Life for the people of the Northside. Is this what we want in our backyards?

Thank you for considering our comments. We have been studying these matters for the past several years and have learned more about the Northside than we ever imagined possible. It is a neighborhood that deserves our respect and protection. We hope that the NSP EIR will dig deeper into the record, there is a mother lode to be mined for the benefit of all the people.

Respectfully yours,

Karen Renfro, Co-founder & Spokesman
(951)787-0617

k.a.renfro7@gmail.com

www.springbrookheritagealliance.org

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

CC:

Northside Specific Plan Team
Springbrook Heritage Alliance

Northside Improvement Association
Spanish Town Heritage Foundation
OSTA-Agua Mansa Chapter

ATTACHMENTS:



 Virus-free. www.avg.com

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
- *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

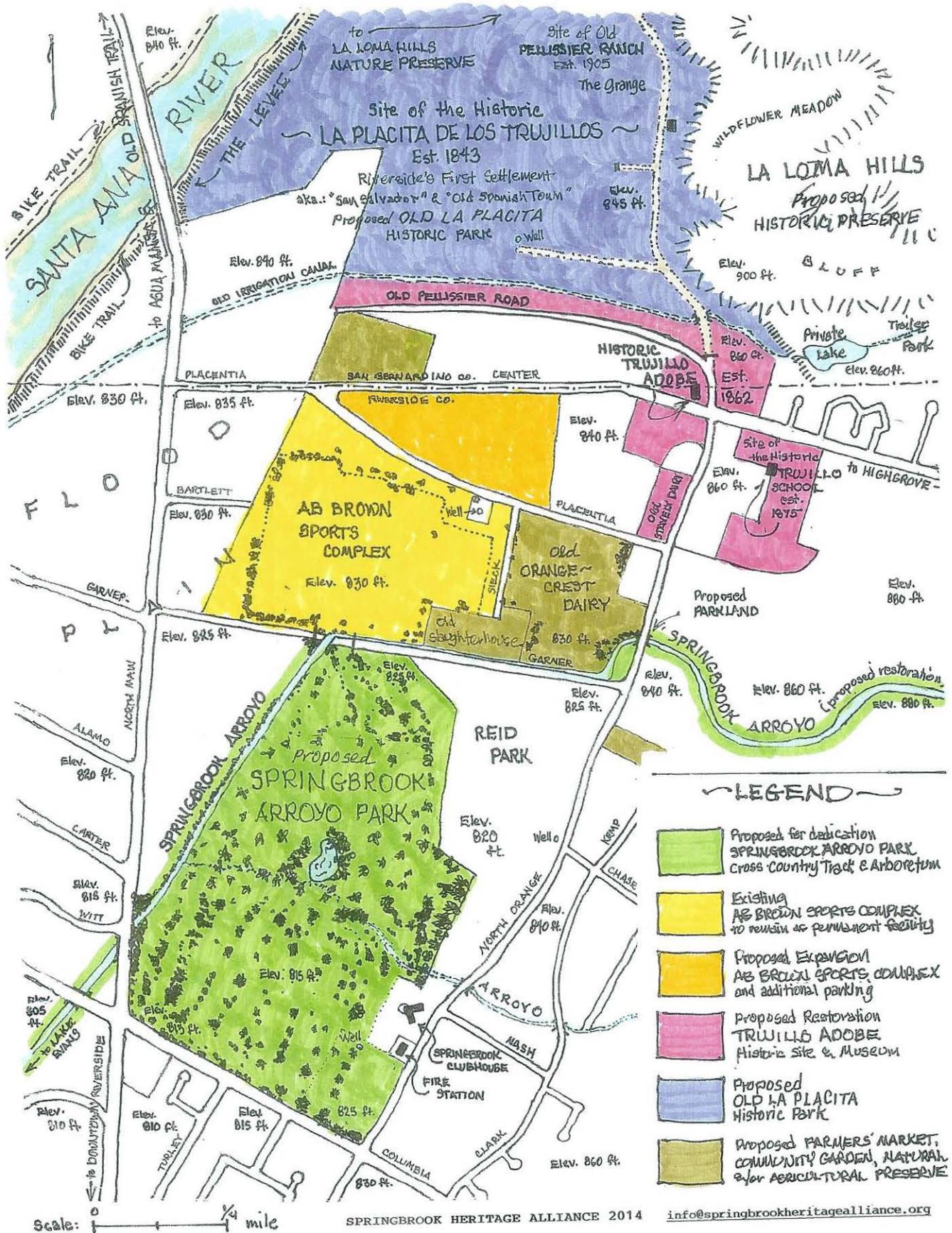
For more information:

info@springbrookheritagealliance.org

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

SPRINGBROOK HERITAGE PARKLANDS & WALKING TRAILS

Old Spanish Town Village District





SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T (213) 236-1800
www.scag.ca.gov

REGIONAL COUNCIL OFFICERS

President
Alan D. Wapner, San Bernardino
County Transportation Authority
First Vice President
Bill Jahn, Big Bear Lake
Second Vice President
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Immediate Past President
Margaret E. Finlay, Duarte

COMMITTEE CHAIRS

Executive/Administration
Alan D. Wapner, San Bernardino
County Transportation Authority
Community, Economic &
Human Development
Peggy Huang, Transportation
Corridor Agencies
Energy & Environment
Linda Parks, Ventura County
Transportation
Curt Hagman, San Bernardino
County

April 30, 2019

Mr. Jay Eastman, AICP, Principal Planner
City of Riverside, Community & Economic Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522
Phone: (951) 826-5264
E-mail: jeastman@riversideca.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Northside Neighborhood & Pellissier Specific Plan [SCAG NO. IGR9867]

Dear Mr. Eastman,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Northside Neighborhood & Pellissier Specific Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

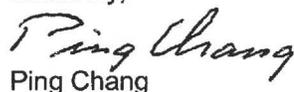
SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Northside Neighborhood & Pellissier Specific Plan in Riverside County. The proposed project includes a specific plan for future growth on a 1,700 acre site.

When available, please send environmental documentation to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,


Ping Chang

Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
NORTHSIDE NEIGHBORHOOD & PELLISSIER SPECIFIC PLAN [SCAG NO. IGR9867]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
	<i>*SCAG does not yet have an agreed-upon security performance measure.</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Riverside Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	336,300	384,100	386,600
Households	6,458,000	7,325,000	7,412,300	101,200	117,700	118,600
Employment	8,414,000	9,441,000	9,871,500	157,900	195,900	200,500

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG’s Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

Dawna Marshall

From: Eastman, Jay <JEastman@riversideca.gov>
Sent: Monday, April 29, 2019 5:52 PM
To: Erin Snyder (epolcene@juno.com)
Cc: Michiko Mimi Morisaki; Dawna Marshall; Carey Fernandes; Brian Mooney
Subject: Northside Neighborhood Specific Plan NOP & IS Comments Deadline

Hi Erin,

As discussed on the phone, the deadline to submit comments on the Northside Neighborhood Specific Plan's Initial Study (IS), and Notice of Preparation (NOP) of an Environmental Impact Report (EIR) is today, April 29, 2019.

However, because the Northside Neighborhood Specific Plan is a community driven planning process, it is important that we receive feedback from community groups who have a vested interest in the planning process. Please consider this e-mail as authorization to submit your environmental comments by May 14, 2019; which follows the next Northside Improvement Association meeting of April 13, 2019.

Of course, you may submit your comments earlier, if desired.

Sincerely,

Jay Eastman, AICP

Principal Planner

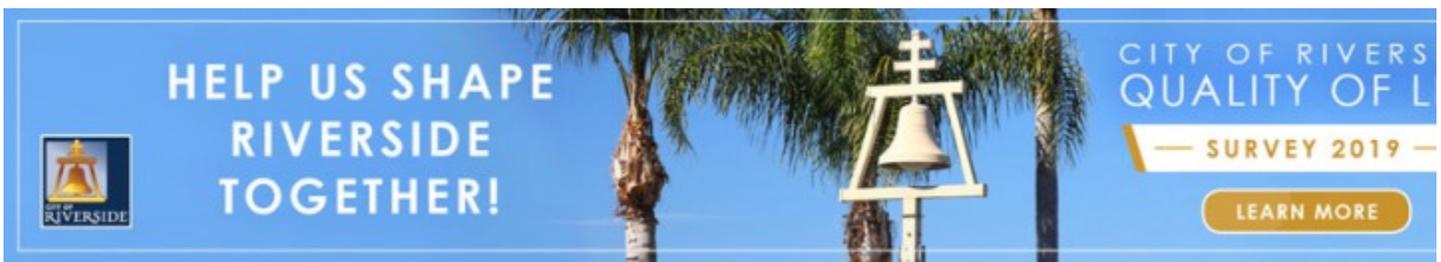
City of Riverside

Community & Economic Development Department

Main: 951.826.5371

Direct: 951.826.5264

JEastman@RiversideCA.gov





INLAND EMPIRE BIKING ALLIANCE

29 April 2019

City of Riverside
Community & Economic Development Dept.
Planning Division
Jay Eastman, AICP – Principal Planner
3900 Main Street, 3rd floor
Riverside, California 92522
jeastman@riversideca.gov

Dear Jay,

I am writing on behalf of the Inland Empire Biking Alliance in response to the Notice of Preparation of an EIR for the Northside [Specific] Plan. Our nonprofit organization is dedicated to addressing the needs and concerns of bicyclists in the Inland Empire and we believe that the planning stage offers a prime opportunity for doing so. As a community is planned and built, it is the best time to ensure that everyone has access to a safe, comfortable place to ride their bike to and throughout their daily needs. Also, bicycling can provide great improvements to concerns such as air quality by shifting trips from driving, especially when used in combination with transit.

To ensure that that vision is made a reality, it needs to be covered as part of the EIR process. Specifically, we would like to ensure that bicycling concerns are covered in any and all traffic impact analyses conducted, including by tabulating and reporting on bicycle and/or a multimodal level of service (LOS) that includes bicycles alongside any other LOS-based measures to be reported. Additionally, given the connection between the level of traffic stress (LTS) metric and injury severity of bicyclists (Chen et al., 2017), the entire transportation network for the project area needs to be analyzed and LTS scores tabulated and addressed in the sections of the analysis that deal with safety as well as bicycling/pedestrians specifically.

As mentioned previously, bicycling has the potential to attract trips from driving which would in turn have positive impacts not only on congestion on the roadways, but also on air quality. This is a particularly salient point given the fact that short trips can be quite polluting due to their length not being long enough for the emissions equipment to reach optimal operating temperature. Thus, providing an environment that is conducive to bicycling can help the project meet several goals. Research has shown that the greatest potential for a shift to biking is for shorter trips and also when combined with transit, but it also requires that people feel that the environment is safe enough for bicycling (Broache, 2012; Sanders, 2013).

Therefore, we would also like to see the potential for bicycling to serve for short trips be reported as part of the air quality analyses. Some examples include an analysis based on a range of assumptions of



INLAND EMPIRE BIKING ALLIANCE

shifting trips to biking such as e.g. the 5% level, the 15% level, and the 30% level and include a report on the infrastructure investments necessary to meet those targets.

So in summary, to ensure that the Northside Plan delivers on the promise of being “a safe, healthy and balanced community” as it is described in the Notice of Preparation, it is imperative that the technical reports to support this be accomplished for bicycling be completed. Reports to identify and mitigate both traffic safety and congestion concerns for bicyclists are vital for making sure that the project enables that reality. Similarly, it is crucial to identify the opportunity that bicycle travel offers for providing air quality improvements as the project is built out. We look forward to seeing these concerns addressed in the Draft EIR when it is released.

Sincerely,

Marven E. Norman, Executive Director

References

- Broache, A. (2012). Perspectives on Seattle Women’s decision to bike for transportation, 1. Retrieved from http://slettau.com/womencyclingproject/downloads/broache_uwthesis_4submission.pdf
- Chen, C., Anderson, J. C., Wang, H., Wang, Y., Vogt, R., & Hernandez, S. (2017). How bicycle level of traffic stress correlate with reported cyclist accidents injury severities: A geospatial and mixed logit analysis. *Accident Analysis and Prevention*, 108, 234–244. <https://doi.org/10.1016/j.aap.2017.09.001>
- Sanders, R. L. (2013). *Examining the cycle: How perceived and actual bicycling risk influence cycling frequency, roadway design preferences, and support for cycling among Bay Area residents*. UC Berkeley UC Berkeley Electronic Theses and Dissertations. University of California, Berkeley. <https://doi.org/http://dx.doi.org/10.1016/j.physbeh.2008.04.026>



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www.lozeaudrury.com
richard@lozeaudrury.com

Via Email and U.S. Mail

May 2, 2019

Jay Eastman, Principal Planner
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David Welch, Director
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Rusty Bailey, Mayor
City of Riverside
3900 Main Street, 7th Floor
Riverside, CA 92522
2mayor@riversideca.gov

Colleen J. Nichol, City Clerk
City of Riverside
3900 Main Street, 7th Floor
Riverside, CA 92522
city_clerk@riversideca.gov

Re: CEQA and Land Use Notice Request for the Northside Neighborhood & Pellissier Ranch Inter-Jurisdictional Specific Plan (a/k/a Northside Specific Plan) (SCH # 2019039168; Zoning Code Amendment P19-0063; General Plan Amendment P19-0064; Specific Plan P19-0065; Program Environmental Impact Report P19-0066)

Dear Mr. Eastman, Mr. Welch, Mayor Bailey, and Ms. Nichol:

I am writing on behalf of the Laborers International Union of North America, Local Union 777 and its members living in the County of Riverside and/or the City of Riverside ("LIUNA") regarding the Northside Neighborhood & Pellissier Ranch Inter-Jurisdictional Specific Plan (a/k/a Northside Specific Plan) (SCH # 2019039168; Zoning Code Amendment P19-0063; General Plan Amendment P19-0064; Specific Plan P19-0065; Program Environmental Impact Report P19-0066), including all actions referring or related to the modification of land use designations including Medium Density Residential, Medium High Density Residential, High Density Residential, Business/Office Park, Commercial, Public

May 2, 2019

CEQA and Land Use Notice Request for the Northside Neighborhood & Pellissier Ranch Inter-Jurisdictional Specific Plan (a/k/a Northside Specific Plan) (SCH # 2019039168)

Page 2 of 3

Facilities and Institutional Uses, Mixed Use, Northside Village Center, Freeway Mixed Use, Spanish Town Heritage Village, and Recreation Open Space Parks and Trails within an approximately 1,700-acre Specific Plan Area located within the jurisdictional boundaries of the City of Riverside, the City of Colton, and the County of Riverside, generally east of the Santa Ana River, south of the La Loma Hills, north of Fairmont Park, and west of the BNSF railroad line, and bisected by State Route 60 and Interstate 215 (“Project”).

We hereby request that the City of Riverside (“City”) send by electronic mail, if possible, or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.
 - Notices of determination that an Environmental Impact Report (“EIR”) is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
 - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
 - Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
 - Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
 - Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
 - Notice of any Final EIR prepared pursuant to CEQA.

May 2, 2019

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- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092,** which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

In addition, we request that the City send to us via email, if possible or U.S. Mail a copy of all Planning Commission and City Council meetings and/or hearing agendas.

Please send notice by electronic mail, if possible, or U.S. Mail to:

Richard Drury
Komalpreet Toor
Stacey Osborne
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
510 836-4200
richard@lozeaudrury.com
komal@lozeaudrury.com
stacey@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Stacey Osborne
Lozeau | Drury LLP



Mike Campisi
Pipeline Planning Assistant

9400 Oakdale Ave
Chatsworth, CA 91311

Tel: 213-231-6081

May 6, 2019

Jay Eastman
City of Riverside
Community & Economic Development Department - Planning Division
3900 Main Street 3rd Floor
Riverside, CA 92522
jeastman@riversideca.gov

**Subject: Northside Neighborhood & Pellissier Ranch Specific Plan and Program
Environmental Impact Report (Northside Specific Plan)**

DCF: 0921-19NC

The Transmission Department of SoCalGas does not operate any facilities within your proposed improvement. However, the Distribution Department of SoCalGas may maintain and operate facilities within your project scope.

To assure no conflict with the Distribution's pipeline system, please e-mail them at:

Sincerely,

Mike Campisi
Pipeline Planning Assistant
SoCalGas Transmission Technical Services
SoCalGasTransmissionUtilityRequest@semprautilities.com

May 6, 2019

1 of 1

Dawna Marshall

From: Diana Ruiz <jediruiz@aol.com>
Sent: Thursday, May 9, 2019 11:13 AM
To: Eastman, Jay
Subject: [External] Fwd: Latest article from Jim Diers: You Can't Build Community Without Doing the Bump

Hi Jay:

Re: Northside EIR and design for creating a sense of community:

1. I didn't see an ag evaluation of the Soils for Northside, only re: drainage qualities. Ideally the soils with the highest capability and least limitations (less erosive: not sloping foothills) would be preserved for ag use, such as around the stream as a flood buffer to urban. Of course I tried to communicate this at the meetings, but it didn't seem to be heard, per the drawing that places ag on sloping, lower quality Soils. I'm happy to provide the ag soil capabilities and limitations to help avoid paving over prime or statewide important Soils.

2. I wanted to share the Riv Neighborhood Partnership discussion around an article by Jim Diers and my experience with great LandUse design in Canyon Crest:

I would be curious to hear your opinion about the Canyon Crest layout. I didn't really appreciate it, until I lived nearby. I hope Northside might be designed like CC with housing around a core center where everyone gravitates. It's not rectangular in the sense of traditional neighborhoods. Streets around the center are like in a triangle with curves.

Thank you for your efforts to engage our community in Northside planning. Please see below and link to article.

Best wishes,

Diana Ruiz
909 2388338

FYI:

I learned this accidentally when I moved to my current home 20 years ago. I had no idea at the time that my neighborhood had the bonus of the Canyon Crest shopping center. It's an amazing example of good planning & maintenance. That shopping center has so many little shops, restaurants & lovely outdoor spaces that it creates a great bumping place. There are also the two large stores: Ralph's & Rite aid.

I know so many people from "bumping" into them on a daily basis there. First there was Sees coffee, later Starbucks with an outdoor water feature for kids surrounded by eating places. Even the parking is well designed around the buildings for quick entry. I've often said that I wish every neighborhood in Riv would have a Canyon Crest shopping center, because the design lends itself to building community. So much better than strip malls. If you haven't been there, I suggest that you check it out.

Diana
Sent from my iPhone

On Wednesday, May 8, 2019, 1:02:11 PM PDT, Sennewald, Yvette
<YSENNEWALD@riversideca.gov> wrote:

RNP Board Members,

Please enjoy the latest article written by Jim Diers and posted
on his Neighbor Power website. 😊

<http://blog.neighborpower.org/uncategorized/you-cant-build-community-without-doing-the-bump/>

Thank you,

Yvette

Yvette Sennewald

City of Riverside

Community & Economic Development, Neighborhood Engagement Division

Direct: (951) 826-5168

Cell: (951) 329-7310

RiversideCA.gov

<[image98e384.JPG](#)>

<image98e384.JPG>



Northside Improvement Association

701 N. Orange Street
Riverside, CA 92501

Organized 1912 • Oldest Community Organization in Riverside

Jay Eastman, Principal Planner

Re: Draft Environmental Impact Report (EIR) for the Northside Specific Plan

The Northside Improvement Association applauds the efforts of the City of Riverside to craft a draft Environmental Impact Report (EIR) for the Northside Specific Plan. This project is long overdue and will help guide development in the Northside Neighborhood into the future.

Most of our concerns will be answered by the results of a full EIR for the project area. There are far too many individual concerns for this project to be covered by a mitigated negative declaration. The notice we received nicely spells out the issues and areas of concern: Aesthetics, Air Quality, Biological Resources, Cultural Resources, etc. Hydrology/Water Quality, Land Use Planning, Transportation (especially Traffic), and Cumulative Effects are our highest concerns.

We would advocate for a maximum of open space. We also advocate for a minimum of high density residential, especially in areas where it is now proposed, an area subject to flooding that has a high potential for soil liquefaction.

Of minor concern are Figures 3 and 4 that accompanied the Notice. The color scheme makes it difficult to distinguish one area from another. Also, the subareas identified by the number labels are never listed, so they are generally meaningless. Also, if Springbrook Arroyo is identified by the number 4, it is not in its proper location.

Overall, this is a good start. To re-iterate, most of our concerns will be covered by a full EIR for the project. We look forward to reviewing the draft EIR

/s/ Peter Wohlgemuth
Vice President
Northside Improvement Association
