



FINAL
Environmental Impact Report
City of Colton Housing Element Update Program 10/11 Rezone and
General Plan Amendment
City of Colton, San Bernardino, California
State Clearinghouse Number 2025010520

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SECTION 1: INTRODUCTION

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Colton (Lead Agency) has evaluated the comments received on the Housing Element Update Program 10/11 Rezone and General Plan Amendment Draft Program Environmental Impact Report (Draft Program EIR). Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a list of persons, organizations, and agencies that provided comments on the Draft Program EIR; responses to the comments received regarding the Draft Program EIR; and a Mitigation Monitoring and Reporting Program (MMRP) for use by the City of Colton during its review.

This document is organized into three sections:

- **Section 1—Introduction.** Provides an introduction to the Final EIR.
- **Section 2—Master Responses.** Provides a single, comprehensive response to similar comments about a particular topic.
- **Section 3—Responses to Written Comments.** Provides a list of the agencies, organizations, and individuals who commented on the Draft Program EIR. Copies of all of the letters received regarding the Draft Program EIR and responses thereto are included in this section.

The Final EIR includes the following contents:

- Draft Program EIR (provided under separate cover)
- Draft Program EIR Appendices (provided under separate cover)
- Master Responses and Responses to Written Comments on the Draft Program EIR (Sections 2 and 3 of this document)
- Mitigation Monitoring and Reporting Program (provided under separate cover)

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SECTION 2: MASTER RESPONSES

Master responses address similar comments made by multiple public agencies, businesses, organizations, or individuals through written comments submitted to the City of Colton. Master responses are provided in the order in which they are referenced in the responses in Section 3.

2.1 - List of Master Responses

- Master Response 1—Parcel inquiries
- Master Response 2—Program Level Analysis is Appropriate for a Housing Element Update and Rezone

2.2 - Master Responses

Master Response 1—Parcel Inquiries

Summary of Relevant Comments

Several members of the community requested information about whether their property would be affected by the proposed project. These comments did not identify concerns regarding the analysis, conclusions, or adequacy of the Draft Program EIR.

Response

The Draft Program EIR, Chapter 2, Exhibit 2-3 through Exhibit 2-7 provide maps of the areas proposed for rezoning under Program 10/11 and the three areas outside of Program 10/11 subject to rezoning. Draft Program EIR, Chapter 2, Table 2-5 summarizes the existing land uses on each identified parcel for rezone and describes the physical changes anticipated on-site to accommodate housing. The notification radius included property owners near the project sites that would not be subject to rezoning. Only those parcels specifically identified in Chapter 2, Table 2-4 of the Draft Program EIR are included in the proposed rezoning action.

Master Response 2—Program Level Analysis is Appropriate for a Housing Element Update and Rezone

Summary of Relevant Comments

Some comments expressed concern that development projects were not fully analyzed for impacts, or that the Draft Program EIR failed to adopt feasible mitigation measures. Other comments suggested mitigation measures such as buffers or setbacks.

Response

The proposed project does not include any specific development proposals or entitlements. The Draft Program EIR is a program-level document that does not approve or propose any specific development project. Accordingly, the Draft Program EIR prepared for the City of Colton Housing Element Update Program 10/11 Rezone and General Plan Amendment is a program-level EIR. A program-level EIR cannot analyze site-specific or project-specific environmental impacts as would

occur when project-level environmental analysis is conducted, because the City does not have site-specific information regarding potential future projects. However, each future development proposed pursuant to the Housing Element Update program must be evaluated for compliance with CEQA and with local codes and ordinances such as the Municipal Code, which specifies, among other things, setbacks and other lot requirements.

The CEQA Guidelines do not specify the level of analysis required in a program EIR, but CEQA recognizes that the level of specificity is determined by the nature of the underlying activity covered by the EIR. CEQA Guidelines Section 15146; *San Franciscans for Livable Neighborhoods v. City & County of San Francisco* (2018) 26 CA5th 596, 608; *North Coast Rivers Alliance v. Kawamura* (2015) 243 CA4th 647, 679; *Citizens for a Sustainable Treasure Island v. City & County of San Francisco* (2014) 227 CA4th 1036, 1051. A program EIR that is prepared to support approval of an overall program, such as a specific plan, may appropriately focus on program-wide issues and leave to later EIRs detailed analysis of issues specific to particular development activities. (CEQA Guidelines § 15168 (d)(2),(3)). See, e.g., *City of Hayward v. Board of Trustees of Cal. State Univ.* (2015) 242 CA4th 833, 849; *Town of Atherton v. California High Speed Rail Auth.* (2014) 228 CA4th 314, 345.

A program EIR is appropriate to evaluate environmental effects “at a broad level,” so long as to the extent a subsequent project is not covered, additional environmental review occurs. See *Committee for Green Foothills v. Santa Clara County Bd. of Supervisors* (2010) 48 Cal.4th 32, 45. A programmatic-level document is designed to provide a level of detail for the public to be informed and decision-makers to make decisions that intelligently take into account environmental consequences consistent with CEQA. Program EIRs “[a]llow the lead agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts.” (CEQA Guidelines §§ 15168(a), 15168(b)(4)). Many site-specific details may be properly deferred to a later environmental review document. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1173). Unlike a project EIR, which addresses the environmental impacts of a specific development project, a program EIR addresses the potential impacts of a series of actions that can be characterized as one large project. Therefore, the use of a program EIR is appropriate in evaluating project-related environmental impacts resulting from implementation of a comprehensive planning program like a general plan or a Citywide planning action such as rezoning or change in General Plan designations, as is the case for the proposed project.

Consistent with CEQA’s requirements, the Draft Program EIR is a program level environmental analysis that serves as a “first-tier” document to assess and document the broad environmental impacts of the proposed project with the understanding that more detailed site-specific environmental reviews may be required to assess future projects implemented under the program. Analysis of the development of specific individual parcels and impacts related to speculative future development projects is neither feasible nor required in the Draft Program EIR.

Because there are no specific development projects being proposed at this time, a project-level analysis cannot be prepared. If the Final EIR is certified, future discretionary projects would be further evaluated in light of the Final EIR to determine whether or not an additional environmental document must be prepared. As appropriate, future construction and development plans would be subject to project-level CEQA analysis and potentially additional feasible mitigation, if necessary. As individual projects with specific site and architectural plans and facilities are submitted to the City for review, the City will evaluate each project in light of the information in the program EIR. (See Public Resources Code Sections 21083.3, 21093, and 21094 and CEQA Guidelines Sections 15152, 15164, 15168, and 15183). If their impacts are within the scope of the information in the program EIR, additional environmental documentation may not be necessary. If new effects are identified that were not addressed, the City would prepare the appropriate additional environmental documentation.

The Draft Program EIR provides the appropriate broad programmatic-level environmental analysis necessary to allow the decision-makers to evaluate the Program 10/11 Rezone/GPA as a comprehensive guide for making future decisions about land use. Project-level analysis is not appropriate, feasible or pragmatic at this stage.

The General Plan is Self-Mitigating

Compliance with established regulatory requirements and standards, such as those in a zoning ordinance or municipal code, is a legitimate basis for determining that the project will not have a significant environmental impact. (*Tracy First v. City of Tracy* (2009) 177 CA4th 912). A requirement that a project comply with specific laws or regulations may also serve as adequate mitigation of environmental impacts if compliance with such standards can be reasonably expected. (CEQA Guidelines Section 15126.4(a)(1)(B)). "[A] condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance." (*Oakland Heritage Alliance v. City of Oakland* (2011) 195 CA4th 884, 906). For example, in *Oakland Heritage Alliance*, the court upheld the City of Oakland's reliance on standards in the building code and City of Oakland building ordinances to mitigate seismic impacts.

The proposed project has been developed to be largely self-mitigating in that the Housing Element Update, of which the Program 10/11 Rezone/GPA is an integral part, is designed to protect, preserve and enhance the environment and environmental resources. The proposed project does not approve or propose any specific development. As a result, with the implementation of identified mitigation measures, there are no significant impacts that would occur solely on the basis of implementation of the proposed project. Any future development would require consistency with the General Plan and Municipal Code and Zoning Ordinance. Thus, by its very nature, Program 10/11 Rezone/GPA is self-mitigating through implementation of comprehensive policies required for new development.

Future Development Proposals will be Reviewed for Environmental Compliance

The Program 10/11 Rezone/GPA does not authorize any new development. As discussed throughout the Draft Program EIR, development consistent with the Program 10/11 Rezone/GPA would be required to conform with federal, State, and local policies that would reduce potential environmental impacts to less than significant levels. When applicable, any additional new

development on the sites included in the Program 10/11 Rezone/GPA would be subject, on a project-by-project basis, to independent CEQA review and required adherence to mandatory regulations, policies, and programs in the General Plan and Municipal Code and other applicable City requirements. Accordingly, the City can reasonably rely on these mandatory regulations and policies to reduce potential environmental impacts.

Regarding potential impacts related to land use compatibility, it is too speculative at this time to know what mitigation or other actions might be required for specific development projects under the Program 10/11 Rezone/GPA. As the City receives development applications for subsequent development under the Program 10/11 Rezone/GPA, those applications will be reviewed by the City for compliance with the policies and programs of the General Plan related to land use and planning, air quality, noise, and other environmental impacts. Future development would also be reviewed for compliance with various federal and State laws and regulations. Lastly, future development under the Program 10/11 Rezone/GPA will be required to comply with MM AIR-2a and MM AIR-2b to reduce air pollutant emissions; MM AIR-3 requiring a Health Risk Assessment; MM GHG-1a through MM GHG1-d to reduce GHG emission impacts; MM NOI-1 requiring a noise reduction plan for construction; MM NOI-2 requiring noise impact reduction prior to issuance of entitlements for any future development projects; MM NOI-3 requiring a vibration reduction plan for future development projects; and MM TRANS-1a and MM TRANS-1b requiring VMT analyses and reduction strategies for future projects. To the extent that there are site-specific or project-specific characteristics that require additional environmental review, that additional environmental review will be conducted at the time that the City is in receipt of a specific development application.

Project Specific Mitigation is Not Deferral

The Draft Program EIR is programmatic in nature and does not evaluate future specific development projects that could be approved within the Housing Element Update area. The policies and programs in the Housing Element Update, of which the proposed project is a part, provide prescriptive measures that inform how future projects will address potential impacts as individual development applications are submitted. Future discretionary projects would be evaluated under CEQA, as applicable, and project-specific mitigation measures would be prescribed, as necessary. Identifying project-specific mitigation at the time development projects are proposed is practical and is not deferral.

Section 15126.4(a)(1)(B) of the CEQA Guidelines states the following, in part: Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will [be] considered, analyzed, and potentially incorporated in the mitigation measure.

As indicated in the language of Section 15126.4(a)(1)(B), mitigation may be developed after project approval when it is infeasible to include such details during a project's environmental review. The

use of a program EIR allows for such a condition; the details of future discretionary projects allowed under a General Plan would be subject to CEQA review at the time they are proposed, and appropriate mitigation would be developed based on such analysis. The General Plan does not propose or approve any specific projects; therefore, future project details are unknown at this time, rendering it both impractical and infeasible to include project-level mitigation.

Mitigation Must Address a Potentially Significant Adverse Impact on the Environment.

Under CEQA, mitigation measures are required only when a project may result in potentially significant adverse impacts on the physical environment. The purpose of mitigation is to reduce or avoid those impacts to a less than significant level, where feasible. In the absence of substantial evidence demonstrating that the proposed project would cause a potentially significant environmental effect, there is no nexus or legal basis to require mitigation measures. CEQA does not require mitigation for impacts that are determined to be less than significant or where no adverse environmental impact has been identified. Accordingly, unless information is provided that demonstrates a potential for significant environmental harm, the imposition of mitigation measures is not warranted. To the extent commenters request additional mitigation, but do not provide any evidence of a potential impact on the environment that requires the requested mitigation, there is no basis for the imposition of mitigation, and the requested mitigation is not warranted.

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SECTION 3: RESPONSES TO WRITTEN COMMENTS

3.1 - List of Authors

A list of public agencies, organizations, and individuals that provided comments on the Housing Element Update Program 10/11 Rezone and General Plan Amendment (Program 10/11 Rezone/GPA, or proposed project) is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Author	Author Code
State Agencies	
California Department of Transportation, District 8.....	CALTRANS-1
California Department of Transportation, District 8.....	CALTRANS-2
Local Agencies	
City of Riverside	RIVERSIDE
San Bernardino County Public Works	SBCPW
Southern California Gas Company.....	SOCALGAS
Individuals	
Apartment Owner (no name given)	OWNER
Ravneet Gill.....	GILL
Ricardo Ibarra	IBARRA
Allen Matkins.....	MATKINS
Julietta Fernandez Menchaca.....	MENCHACA
Bobby Nazier	NAZIER
Lorena Rogoff	ROGOFF
Jason Viegas.....	VIEGAS

3.2 - Responses to Comments

3.2.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Colton, as the lead agency, evaluated the comments received on the Draft Program EIR (State Clearinghouse No. 2025010520) for the Program 10/11 Rezone/GPA, and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final EIR for the project in accordance with CEQA Guidelines Section 15132.

3.2.2 - Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.

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California Department of Transportation

DISTRICT 8
464 WEST 4TH STREET
SAN BERNARDINO CA, 92401
-7520



October 16, 2025

Route & Postmile #: N/A - Citywide
Cross Street: N/A
GTS ID: 37575
SCH #:

City of Colton
Planning Manager
Attn: Mario Suarez
650 N La Cadena Drive
Colton, CA 92324

Subject: City of Colton, Program 10/11 Housing Element Update, General Plan Amendment and Rezone

The California Department of Transportation (Caltrans) Local Development Review (LDR) branch has completed its evaluation of the working Amendment Draft Environmental Impact Report (ADEIR) for the City of Colton General Plan Amendment.

Caltrans is committed to supporting a multimodal transportation system that serves local development projects. Planning for facilities that accommodate pedestrians, cyclists, transit riders, and car/vanpool users encourages more multimodal travel. This, in turn, helps reduce traffic congestion, vehicle miles traveled (VMT), greenhouse gas emissions, and the State's contribution to climate change.

The project proposes six areas in the city that relate to the Program 10/11 Rezone, and General Plan amendment of the 2021-2029 General Plan Housing Element Update. The purpose of the proposed project is to accommodate the RHNA and increase the land available for development.

This project proposes updates to the city's General Plan Amendment.

- Citywide Area constituting approximately 89.9 acres for potential rezoning
- General Plan Amendment

Based on the information provided in the ADEIR and its associated documents, we are submitting the following comments and recommendations for your consideration:

Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) Reduction

1. Future developments must conduct a Vehicle Miles Traveled (VMT) study for projects that may substantially increase VMT. This study should also include an assessment of pedestrian and bicycle facilities within the project site. Additionally, project proponents are encouraged to coordinate with nearby planned bike networks to contribute to a larger active transportation network. The City should consider establishing a VMT Mitigation Impact Fee to help mitigate potential impacts on the State Highway System. 2
2. Future developments must also consider the traffic safety impacts on the State Highway System resulting from new pedestrian and bicyclist needs, particularly where new origins or destinations intersect a State Route. Additionally, the analysis should address multimodal conflict points and changes in traffic composition, such as an increase in bicyclists or pedestrians, especially in areas where features like shoulders or sidewalks may not exist or are inconsistent with the facility's design. 3
3. Caltrans recommends that project proponents collaborate with the city to explore the possibility of converting a portion of the planned residential units into affordable housing units. Affordable housing is typically denser and more compact than market-rate housing, which helps reduce VMT by promoting shorter commutes and greater accessibility to essential services and public transportation. 4
4. Caltrans recommends that the project implement multimodal strategies, such as those derived from Transit-Oriented Development (TOD), to further reduce the traffic-related impacts of future projects. 5
5. Active Transportation Plans and Smart Growth initiatives play a key role in supporting the state's 2050 Climate goals. Caltrans supports efforts to reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by promoting strategies that encourage greater use of, and benefits from, a multimodal transportation network. 6
6. Early engagement with Caltrans is strongly recommended for future projects that may impact state right-of-way. Additionally, before initiating the traffic study, please ensure that Caltrans is included in the scoping process. 7

Traffic Operations

1. Please provide the completed Traffic Analysis Report for the proposed sites. Traffic Report should include findings and recommendations for opening year and horizon year if applicable. 8
2. Each individual Traffic Report should also include Traffic Safety Evaluation at each proposed project sites and provide potential safety counter measures if applicable. 9
3. Provide the cumulative Traffic Report, the report should reflect the entire roadway network improvements and involve implementations of Pedestrian facility, Bicycle facility, Sidewalk, and Crosswalk if necessary, and please update the General Plan accordingly. 10
4. Once plans for the project site are available, please provide appropriate mitigation measures for the site to reduce VMT impacts. 11
5. For locations with significant VMT impact, we recommend changes in the proposed project or mitigation which would reduce VMT impact to less than significant. 12

Traffic Forecasting

1. Provide recommended mitigation measures for other sites, if applicable. 13
2. Provide VMT Screening models for the cumulative VMT impact. 14
3. Recommendation to use the project level analysis. Please provide the rationale for the overriding consideration. 15

Equitable Access

If any Caltrans facilities are impacted by the project, they must comply with American Disabilities Act (ADA) Standards upon project completion. Additionally, the project must ensure the maintenance of bicycle and pedestrian access throughout the construction phase. These access considerations align with Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

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Caltrans Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' Right-of-Way (ROW) requires a Caltrans-issued encroachment permit.

For information regarding the Encroachment Permit application and submittal requirements, contact:

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Caltrans Office of Encroachment Permits
464 West 4th Street, Basement, MS 619
San Bernardino, CA 92401-1400
(909) 383-4526

D8.E-permits@dot.ca.gov
<https://dot.ca.gov/programs/traffic-operations/ep>

Thank you again for including Caltrans in the review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D8@dot.ca.gov or call 909-925-7520.

Sincerely,



Janki Patel
Branch Chief - Local Development Review
Division of Transportation Planning
Caltrans District 8

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State Agencies

California Department of Transportation—District 8 (CALTRANS-1)

Response to CALTRANS-1-1

This comment contains a summary of the proposed project and introductory remarks. No specific environmental issues or questions were raised in this introductory comment. All substantive comments are addressed individually in the responses below.

Response to CALTRANS-1-2

The commenter recommends that future developments conduct a Vehicle Miles Traveled (VMT) study for projects that may substantially increase VMT, including an assessment of pedestrian and bicycle facilities. The commenter also encourages coordination with planned bike networks and suggests the City consider establishing a VMT Mitigation Impact Fee to help mitigate potential impacts on the State Highway System.

The Draft Program EIR, Section 3.16, page 3.16-38 states that all future individual development projects will undergo a project-level VMT analysis to assess potential transportation impacts, as required by MM TRANS-1b. The Draft Program EIR includes an evaluation of existing and planned pedestrian and bicycle facilities and requires that future projects be evaluated for project-specific impacts and provide fair-share funding, if required, for recommended improvements to reduce pedestrian- and bicycle-related impacts (Draft Program EIR, Section 3.16, page 3.16-32 and 3.16-33). Additionally, the Draft Program EIR encourages coordination with local and regional Active Transportation Plans (ATPs). For example, Draft Program EIR, Section 3.16, pages 3.16-15 to 3.16-17 discusses the City's planned bicycle network and the need for new development to connect to existing and planned facilities. Therefore, the Draft Program EIR addresses these issues. These comments are noted.

The City acknowledges Caltrans' recommendation to consider a VMT Mitigation Impact Fee. While the Draft Program EIR does not propose a citywide VMT mitigation fee at this time, it does require that project-level VMT impacts be mitigated through Transportation Demand Management (TDM) strategies and other feasible measures (see MM TRANS-1a and MM TRANS-1b). However, the City may consider the commenter's recommendation regarding a VMT Mitigation Impact Fee as part of future transportation planning.

Response to CALTRANS-1-3

Caltrans recommends that future developments consider traffic safety impacts on the State Highway System resulting from new pedestrian and bicyclist needs.

Draft Program EIR, Section 3.16, page 3.16-31 requires that future development projects within the Program 10/11 Rezone/GPA area be evaluated for project-specific impacts and provide fair-share funding, if required, for recommended improvements to reduce pedestrian- and bicycle-related impacts. Therefore, the Draft Program EIR addresses these issues. This comment is noted.

Response to CALTRANS-1-4

The City's Housing Element includes policies to facilitate affordable housing. As stated in the Executive Summary, page ES-2 of the Draft Program EIR, the underlying purpose of the Program

10/11 Rezone/GPA is to accommodate the Regional Housing Needs Assessment (RHNA) and increase the inventory of land available for the development of housing compliant with State law and consistent with the General Plan. Project objectives include meeting housing needs by encouraging a variety of housing development affordable at all income levels. As stated in Chapter 1, page 1-1 of the Draft Program EIR, the City of Colton’s current land use plans and zoning regulations do not provide adequate capacity to fully accommodate the RHNA allocation in all income categories, and further rezoning is necessary to create additional housing opportunities. The proposed project would encourage affordable housing near transit and essential services, supporting VMT reduction and multimodal access (see Draft Program EIR Section 3.10, Land Use and Planning). Future development projects that occur within the Program 10/11 Rezone/GPA area would be evaluated for consistency with the Program 10/11 Rezone/GPA. Therefore, the Draft Program EIR fully addresses these concerns. This comment is noted.

Response to CALTRANS-1-5

The commenter recommends that the proposed project implement multimodal strategies, such as those derived from Transit-Oriented Development (TOD). The City’s General Plan Mobility Element and Housing Element Update, as described in the Draft Program EIR (Section 3.10, Land Use and Planning and Section 3.16, Transportation), include policies that promote infill development, higher-density residential uses, and mixed-use zoning in areas near transit and activity centers. The Program 10/11 Rezone specifically upzones areas to allow for higher-density and mixed-use development in proximity to existing and planned transit corridors (see Draft Program EIR Chapter 1, Section 1.5 and Chapter 2, Table 2-4). Additionally, the Draft Program EIR (Section 3.16, Transportation) requires that future projects be evaluated for project-specific impacts and provide fair-share funding, if required, for recommended improvements to reduce pedestrian-, bicycle-, and transit-related impacts. Therefore, this concern has been fully addressed in the Draft Program EIR, and no further analysis is required.

Response to CALTRANS-1-6

The City acknowledges the commenter’s support for ATPs, Smart Growth, and multimodal strategies to reduce VMT and greenhouse gas (GHG) emissions. The City’s ATP inventories existing and planned pedestrian and bicycle facilities, identifies network gaps, and prioritizes improvements to enhance safety, connectivity, and access. The ATP includes specific goals and objectives to achieve these goals (Draft Program EIR, Section 3.16, page 3.16.-26 to 3.16-28). Therefore, this concern has been addressed in the Draft Program EIR, Section 3.16, Transportation.

Smart growth is an overall approach of development and conservation strategies that can help protect our health and natural environment and make our communities more attractive, economically stronger and resilient to climate change.¹ The proposed project includes components that align with smart growth strategies, including encouraging infill development, higher-density and mixed-use zoning, and residential development near transit and activity centers. The proposed project’s approach is consistent with the State’s 2050 Climate goals and the objectives of SB 375, SB 743, and the California Air Resources Board’s Scoping Plan, which emphasize VMT and GHG reduction through integrated land use and transportation planning. Therefore, this concern has been

¹ United States Environmental Protection Agency (EPA). 2025. About Smart Growth. Website: <https://www.epa.gov/smartgrowth/about-smart-growth>. Accessed December 3, 2025.

addressed in the Draft Program EIR, Section 3.16, Transportation, Section 3.2, Air Quality, and Section 3.7, Greenhouse Gas Emissions.

See Response to Comment CALTRANS-1-5 regarding multimodal strategies.

Response to CALTRANS-1-7

This comment is noted. All future individual development projects will be subject to project-level review, including traffic impact analysis as appropriate. The City will continue to coordinate with Caltrans early in the planning and environmental review process for future projects that may impact State right-of-way.

Response to CALTRANS-1-8

The Traffic Analysis Report can be found in Appendix F of the Draft Program EIR. Future developments would be required to prepare a site-specific Traffic Analysis Report.

Response to CALTRANS-1-9

The analysis in the Draft Program EIR does not examine the site-specific effects of individual future projects that would directly contribute to roadway safety hazards because the Draft Program EIR is a program-level analysis and no information is available for analysis regarding potential future specific development projects. Safety concerns for individual development projects will be considered when future development proposals are proposed.

Response to CALTRANS-1-10

The City of Colton acknowledges the commenter's request for a comprehensive cumulative Traffic Report and for updates to the General Plan. The Draft Program EIR includes a cumulative traffic analysis in Section 3.16, Transportation. The cumulative analysis evaluates the impacts of the proposed project in conjunction with regional growth forecasts and planned improvements, using the San Bernardino Transportation Analysis Model (SBTAM) and the City's General Plan Mobility Element. The analysis considers the planned roadway network, including improvements funded through the City's Development Impact Fee (DIF) program and regional programs such as Measure I. The City's General Plan Mobility Element and ATP are referenced throughout the Draft Program EIR and are used to inform the analysis. This approach is compliant with the CEQA requirements for a Program EIR. Therefore, no additional analysis is required.

Response to CALTRANS-1-11

The analysis in the Draft Program EIR does not examine the site-specific VMT impacts of individual future projects because the Draft Program EIR is a program-level analysis and no information is available for analysis regarding potential future specific development projects. The VMT impacts of individual development projects will be considered when future development is proposed. The City will review future development proposals and will require mitigation measures, as needed, to reduce VMT impacts.

Response to CALTRANS-1-12

See Response to CALTRANS-1-15 regarding VMT impacts for future development projects.

Response to CALTRANS-1-13

The City acknowledges the commenter's request for recommended mitigation measures for other sites evaluated in the Draft Program EIR. The Draft Program EIR provides program-level analysis and mitigation measures for all environmental topics where significant impacts may occur. Individual development projects will be considered when future development is proposed. The City will review future development proposals and will require mitigation measures as needed to reduce traffic impacts.

Response to CALTRANS-1-14

The cumulative VMT analysis in the Draft Program EIR is based on the City's adopted VMT Guidelines and utilizes the SBTAM, as described in Section 3.16, Transportation. The technical appendices and model documentation, including the VMT Technical Memorandum, are available in Appendix F of the Draft Program EIR. Cumulative impacts will be considered for future development projects within the Program 10/11 Rezone/GPA area at the time those projects are proposed. No further response is required.

Response to CALTRANS-1-15

The analysis in the Draft Program EIR does not examine the site-specific VMT impacts of individual future projects because the Draft Program EIR is a program-level analysis and no information is available for analysis regarding potential future specific development projects. Future individual development projects consistent with the Program 10/11 Rezone/GPA will be subject to project-level environmental review, including site-specific technical studies and mitigation as appropriate. This tiered approach will ensure that project-level impacts are evaluated and mitigated as specific development is proposed. Any project-level analysis conducted as part of the Draft Program EIR would be considered speculative since no specific development is being proposed or entitled as part of the Draft Program EIR. Therefore, a program-level analysis is the appropriate level of analysis.

Additionally, the rationale for adopting a statement of overriding considerations is provided in Section 5.1 of the Draft Program EIR. The Housing Element Update is required by State law to accommodate the City's RHNA and to provide adequate sites for housing at all income levels. The benefits of providing needed housing, supporting economic development, and complying with State mandates outweigh the significant and unavoidable environmental impacts identified in the Draft Program EIR.

The City will conduct project-level CEQA review for future development to mitigate potentially significant impacts at the project level.

Response to CALTRANS-1-16

The City of Colton acknowledges Caltrans' requirements regarding Americans with Disabilities Act (ADA) compliance and the maintenance of bicycle and pedestrian access during construction. No specific development is proposed as part of the Draft Program EIR. Each development project under the Program 10/11 Rezone/GPA would be evaluated for project-specific impacts with regard to bicycle and pedestrian access. Future development projects consistent with Program 10/11 Rezone/GPA would be subject to all applicable City Guidelines, standards, and specifications related to the circulation system, including transit, bicycle, and pedestrian facilities, including ADA

compliance. Any future projects within the Program 10/11 Rezone/GPA area that impact Caltrans facilities will comply with ADA Standards.

Response to CALTRANS-1-17

Caltrans advises that any permanent work or temporary traffic control that encroaches onto Caltrans' right-of-way requires an encroachment permit. The City will ensure that, for any future development or construction activities associated with the Program 10/11 Rezone/GPA that may encroach onto Caltrans' right-of-way, the project proponent will coordinate with Caltrans and obtain all necessary encroachment permits pursuant to Section 671.5 (a) of the California Streets and Highways Code.

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California Department of Transportation

DISTRICT 8
WEST 4TH STREET
J BERNARDINO CA, 92401
PH 925-7520



December 4, 2025

Route & Postmile #: City Wide
Cross Street: N/A
GTS ID: 38256
SCH #: 2025010520

City of Colton
Planning Manager
Attn: Mario Suarez
659 North La Cadena Drive
Colton, CA 92324

Subject: Draft EIR, Housing Element Program 10 & 11 Rezone and General Plan Amendment.

The California Department of Transportation (Caltrans) Local Development Review (LDR) Branch has completed its evaluation of the Draft EIR, prepared for the City of Colton.

Caltrans appreciates the opportunity to review the Draft EIR for the Housing Element Program 10 & 11 General Plan Amendment and Rezone (SCH No. 2025010520). While the Project does not propose direct physical impacts to the State Highway System (SHS), Caltrans provides comments due to the **significant increases in Vehicle Miles Traveled (VMT)** and the DEIR's identification of multiple **significant and unavoidable impacts** across air quality, cultural resources, and parks/open space, as shown in the Executive Summary Matrix.

1

Our comments focus on clarity, SB 743 compliance, mitigation effectiveness, and statewide consistency.

Section 1 – Project Understanding and SHS Interface

According to the DEIR Executive Summary, the Project rezones approximately 89.9 acres across six areas to accommodate RHNA requirements for the 2021–2029 Housing Element. The DEIR anticipates 1,953 new units at buildout, with revised densities in R3, R4, and Mixed-Use Downtown zones. While the Project does not modify roadway classifications or propose direct construction on the SHS (I-10, I-215, SR-60), the associated land use intensification will influence regional travel behavior.

2

Caltrans reviews such proposals because region-wide VMT growth affects:

- Long-term congestion patterns

"Improving lives and communities through transportation"

- Interregional travel demand
- Transit and active transportation viability
- Achievement of State climate goals

2
CONT

Section 2 – VMT Methodology and Consistency with SB 743

The DEIR concludes that the Project results in **a significant VMT impact that cannot be mitigated to less-than-significant** under CEQA. To strengthen CEQA defensibility, Caltrans recommends clearly documenting the following:

3

- **VMT Metric** (per capita, per household, etc.)
- **VMT Threshold Basis** and justification
- **Model/Tool Inputs and assumptions**, including SCAG models where applicable
- **Screening Results** (transit proximity, low-VMT areas, project type)
- **Consistency with SCAG’s Connect SoCal SCS strategies**

In addition, and consistent with guidance from the Caltrans Office of Sustainability, the Transportation section should also include an additional VMT metric for completeness.

Specifically:

If the Transportation section or future specific development is intended to address VMT impacts from land use and transportation projects, it should include absolute annual VMT under ‘VMT Estimates’ as an additional VMT metric for transportation projects or improvements on the state highway system, as outlined in the Caltrans Transportation Analysis Framework (TAF).

4

Including absolute annual VMT helps ensure consistency with statewide Caltrans analytical requirements.

Section 3 – Evaluation of Proposed Mitigation Measures

The Executive Summary identifies mitigation for multiple environmental topics; however, **no specific mitigation measures are listed for Transportation or VMT impacts**. This either indicates that the Project finds VMT impacts unavoidable without exploring mitigation, or that mitigation is programmatic and insufficiently defined.

5

For compliance with SB 743 and CEQA Guidelines §15064.3, VMT mitigation must be specific, feasible, evidence-supported, and measurable. Strategies typically include:

- Transit service enhancements
- Active transportation and first/last-mile improvements
- Transportation Demand Management (TDM) measures
- Parking reform (e.g., unbundling, reduced minimums)
- Mixed-use and density enhancements

6

The Office of Sustainability provided the following additional mitigation guidance, which Caltrans requests be incorporated into the City’s mitigation considerations:

Caltrans supports the VMT reduction strategies as identified in TRANS-1a. It should be noted that CAPCOA provides a comprehensive list of potential measures that may result in higher

“Improving lives and communities through transportation”

efficacy than the identified strategies in TRANS-1a. These include but are not limited to: limiting and unbundling residential parking supply, pricing public parking, providing micromobility, and increasing residential density. It is highly suggested that the City of Colton considers these strategies and incorporates them as potential options, if feasible. Chapter 3 of CAPCOA can be referred to for Transportation related measures with identified mitigation potential.

6
CONT

Caltrans recommends that the City meaningfully evaluate these CAPCOA measures and incorporate them where feasible into mitigation commitments.

Section 4 – Recommended Revisions to Mitigation Commitments

Given the DEIR's significant and unavoidable findings in other resource areas, Caltrans recommends strengthening the Transportation section by:

- Identifying specific implementation mechanisms (zoning, CIP, development agreements)
- Clarifying implementation responsibility (City departments, Omnitrans, SBCTA, private applicants)
- Adding location-specific multimodal improvements
- Requiring documentation of transit agency concurrence for transit-based mitigation
- Including measurable VMT performance targets and monitoring/reporting protocols

7

Without these enhancements, VMT mitigation remains non-specific and unenforceable.

Section 5 – Interagency Coordination and Statewide Consistency

District 8 requested HQ assistance regarding VMT mitigation effectiveness. Caltrans Headquarters and the Office of Sustainability are available to collaborate further with District 8 and the City to ensure statewide consistency and the use of evidence-based VMT reduction strategies.

8

Section 6 – Closing and Contact Information

Thank you for the opportunity to review this Draft EIR. Caltrans looks forward to continued coordination with the City of Colton. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D8@dot.ca.gov or call 909-925-7520.

9

Sincerely,



Janki Patel

Branch Chief - Local Development Review
Division of Transportation Planning
Caltrans District 8

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State Agencies

California Department of Transportation—District 8 (CALTRANS-2)

Response to CALTRANS-2-1

This comment consists of introductory remarks and states that the letter will focus on VMT, significant and unavoidable impacts and mitigation, clarity, SB 743 compliance, and Statewide consistency. The specific comments on these concerns are addressed below.

Response to CALTRANS-2-2

This comment summarizes the proposed project and states that Caltrans is reviewing the proposed project because Caltrans believes the project will influence regional travel behavior, including long-term congestion patterns, interregional travel demand, transit and active transportation viability, and achievement of State climate goals. This comment is noted. No response is required.

Response to CALTRANS-2-3

The commenter claims that the proposed project will have a significant and unavoidable VMT impact that cannot be mitigated to less than significant levels under CEQA. The commenter also recommends documenting VMT metric per capita, VMT threshold basis and justification, model/tool inputs and assumptions including Southern California Association of Governments (SCAG) models, screening results, and consistency with SCAG's Connect SoCal Southern California Edison (SCS) strategies. Information about these topics is provided in the following paragraphs.

As described in Draft Program EIR, Section 3.16, Transportation, the VMT analysis was prepared in accordance with CEQA Guidelines Section 15064.3 and the City of Colton's adopted VMT thresholds, which are based on guidance from the California Governor's Office of Land Use and Climate Innovation (LCI), previously the California Governor's Office of Planning and Research (OPR), and regional standards established by SCAG.

The VMT metric and thresholds are consistent with the commenter's recommendations. As described in Appendix F, the analysis uses VMT per capita as the metric for residential land uses, consistent with CEQA Guidelines and LCI Technical Advisory. The City's threshold of significance is based on a 15 percent reduction from existing regional VMT per capita, which aligns with SCAG's regional planning objectives and LCI recommendations.

Regarding model inputs and assumptions, the Draft Program EIR's VMT analysis was based on the SBTAM, as described in Section 3.16, Transportation.

The Draft Program EIR discusses VMT screening in Section 3.16, page 3.16-34. As discussed in the analysis, the proposed project does not qualify for any screening criteria and was therefore required to provide an evaluation of the proposed project's VMT impact.

The Program 10/11 Rezone/GPA supports SCAG's SCS strategies by promoting infill development and increasing housing near transit corridors. These strategies are discussed in Section 3.16, Transportation, and in the project's consistency analysis with regional plans.

Regarding Caltrans' claims that VMT impacts would be significant and unavoidable, the Draft Program EIR discloses in Section 3.16, Table 3.16-5 that the proposed project's addition to existing baseline conditions exceeds the City's adopted VMT impact threshold in several areas. Because the proposed project's addition to existing baseline conditions exceeds the City's adopted VMT impact threshold, VMT reduction strategies would be required pursuant to MM TRANS-1a and MM TRANS-1b. The Draft Program EIR concluded that these mitigation measures would reduce VMT per capita to below the City's threshold. Furthermore, the Draft Program EIR determined that while some of the potential sites for rezoning are located in areas that are expected to generate a Home-Based VMT per resident above the relevant threshold of significance, the citywide VMT per capita would be reduced by the proposed project, and the project's incremental contribution to cumulative traffic impacts would not be significant (Draft Program EIR, Section 3.16, page 3.16-39). No further analysis is required.

Response to CALTRANS-2-4

The commenter states that the Draft Program EIR should include an analysis of "absolute annual VMT."

Under the CEQA Guidelines and City VMT Guidelines, the required metric for transportation impact analyses is VMT per capita, as previously discussed. Although absolute annual VMT is not required by CEQA, the VMT Technical Memorandum (Appendix F) included an analysis of citywide VMT per capita for informational purposes. The citywide VMT per capita was shown to be reduced with the addition of the proposed project, which would indicate that the proposed project would increase VMT efficiency and lower VMT per capita on a citywide level. Although the citywide VMT would be reduced by the proposed project, the significance determination is based on the VMT per capita as required by the City VMT Guidelines. Therefore, no changes are required to the VMT analysis.

Response to CALTRANS-2-5

The commenter is correct that the mitigation measures are programmatic. The Draft Program EIR identifies feasible program-level mitigation. Project-specific measures will be required as part of future development applications but cannot be included in the Program EIR given the lack of site-specific information regarding potential future development. The Draft Program EIR's program-level analysis and mitigation measures meet the requirements of CEQA as described in detail in Master Response 2.

Response to CALTRANS-2-6

The Draft Program EIR includes mitigation measures MM TRANS-1a and MM TRANS-1b, which require implementation of TDM strategies to reduce VMT and project-level VMT analysis to identify and apply appropriate measures. The City acknowledges that strategies such as limiting and unbundling residential parking supply, pricing public parking, providing micromobility, and increasing residential density can be effective in reducing VMT. MM TRANS-1a and MM TRANS-1b allow incorporation of additional strategies, including those identified by Caltrans and California Air Pollution Control Officers Association (CAPCOA), where appropriate and feasible at the project level. Future development proposals will be required to implement the appropriate mitigation measures to reduce any potential significant impacts. Please also refer to Master Response 2.

Response to CALTRANS-2-7

Future projects will be required to reduce any potentially significant VMT impacts. The recommendations provided in this comment will be considered during future project-level review. As discussed in Response to CALTRANS-2-6, MM TRANS-1a, and MM TRANS-1b allow incorporation of additional strategies at the project level. Please refer to Master Response 2.

Response to CALTRANS-2-8

The commenter states that Caltrans headquarters is available to assist with District 8 and the City. This comment is noted.

Response to CALTRANS-2-9

This comment consists of concluding remarks and provides contact information. This comment is noted.

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Fw: City of Colton NOA of a DEIR for Housing Element Programs 10 & 11 General Plan Amendment & Rezoning - City of Riverside Advisory Comment

From Mario Suarez <msuarez@coltonca.gov>
Date Fri 11/21/2025 3:14 PM
To Cecilia So <cso@fcs-intl.com>; Alison Rondone <arondone@fcs-intl.com>
Cc Heidi Duron <hduron@coltonca.gov>

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From: Manges, Clarissa <CManges@riversideca.gov>
Sent: Friday, November 21, 2025 8:32 AM
To: Mario Suarez <msuarez@coltonca.gov>
Cc: Taylor, Matthew <MTaylor@riversideca.gov>; Palafox, Daniel <DPalafox@riversideca.gov>; Gross, Christopher <CGross@riversideca.gov>; Yamamoto, Blake <BYamamoto@riversideca.gov>; Ibrahim, Mohammed <MIbrahim@riversideca.gov>
Subject: City of Colton NOA of a DEIR for Housing Element Programs 10 & 11 General Plan Amendment & Rezoning - City of Riverside Advisory Comment

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Hi Mario,

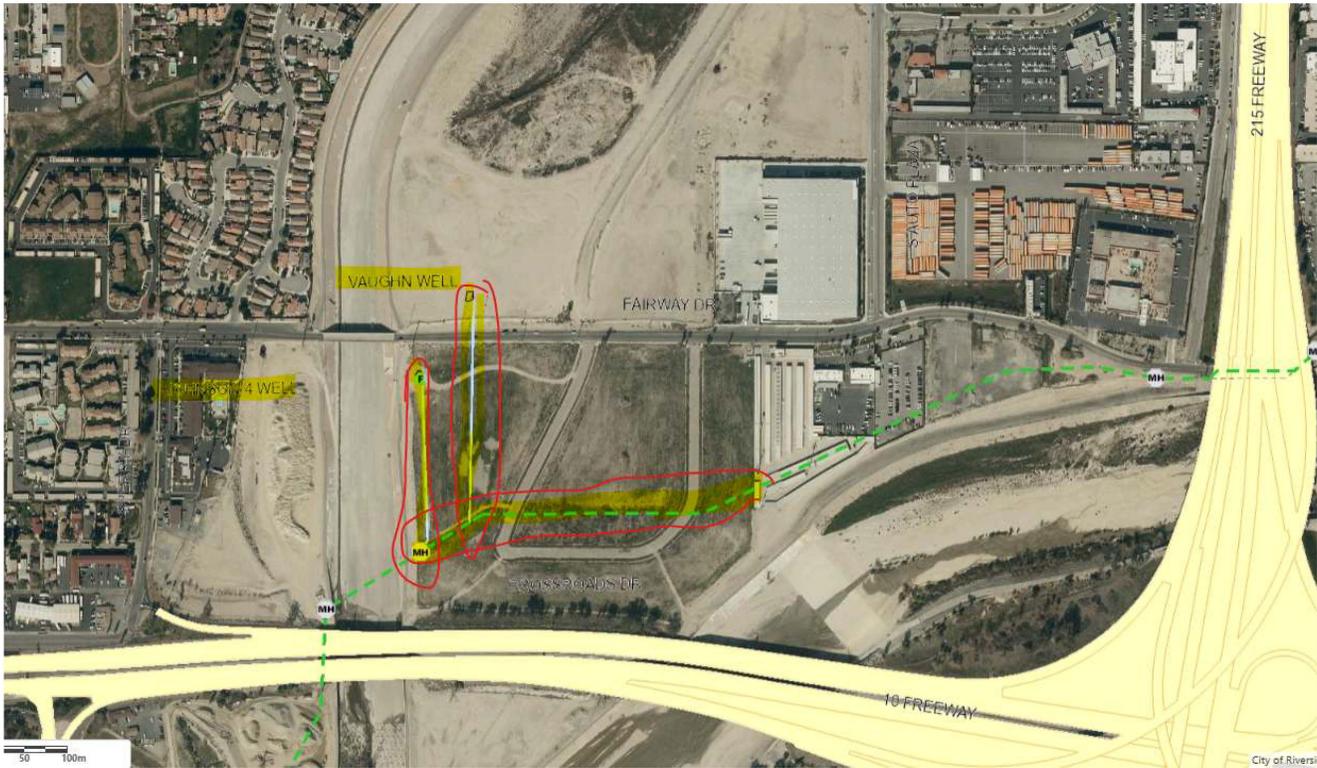
The City of Riverside is in receipt of the City of Colton's Notice of Availability (NOA) for the Draft Environmental Impact Report (DEIR) for the general plan amendment and rezoning of parcels to implement Housing Element Programs 10 & 11. The City of Riverside does not have any comments on the Environmental Impact Report itself, but we do have an advisory comment from Riverside Public Utilities (RPU)-Water:

RPU owns the Johnson 4 Well, Vaughn Well, and a section of the Riverside Canal going through the proposed development site. Please ensure that operation of these facilities is not affected by the project.

Location of RPU facilities:

1

2



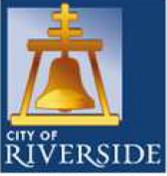
2
CONT

Location of project:



Please let us know if you have any questions or comments!

2
CONT



City of Arts & Innovation

Clarissa Manges *(she/her)*

Assistant Planner

City of Riverside

Community & Economic Development
Department | [Planning Division](#)

Direct: 951-826-5264 |

Main/One Stop Shop: 951-826-5800 |

Email: cmanges@riversideca.gov

Location: 3900 Main Street, 3rd Floor, Riverside CA 92522

Stay in-the-know with all things Riverside! Connect with us at RiversideCA.gov/Connect.

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Local Agencies

City of Riverside (RIVERSIDE)

Response to RIVERSIDE-1

This comment consists of introductory remarks and states that the City of Riverside does not have any comments on the Draft Program EIR, but Riverside Public Utilities has an advisory comment. The response to this comment is provided below.

Response to RIVERSIDE-2

The commenter requests that the operation of the Johnson 4 Well, Vaughn Well, and Riverside Canal, located on Area 4 (Draft Program EIR, Section 3.3, Exhibit 3.3-1), would not be affected by the proposed project. The Draft Program EIR is a program-level analysis that does not propose or entitle any specific development projects. Further, given the lack of site-specific information regarding potential future development, the Program EIR can only discuss whether the proposed project would have an impact on any of these facilities. As detailed in the Program EIR, the proposed project would not have an impact on any of these facilities. Individual development projects will be considered when future development is proposed. The City will review future development proposals and will require mitigation measures as needed to reduce any impacts related to utilities, including the facilities mentioned above.

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From: Alvarez, Alejandra - DPW <Alejandra.Alvarez@dpw.sbcounty.gov>
Sent: Wednesday, November 5, 2025 10:22 AM
To: Mario Suarez <msuarez@coltonca.gov>
Cc: Camacho, Maria <Maria.Camacho@dpw.sbcounty.gov>; Smith, Ayida <Ayida.Smith@dpw.sbcounty.gov>; Sansonetti, Nancy <Nancy.Sansonetti@dpw.sbcounty.gov>
Subject: Outside Environmental Review - CITY OF COLTON HOUSING ELEMENT PROGRAM 10 AND 11

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Hello Mr. Suarez,

Please see attached comment letter for the project subject mentioned above.

Thank you and have a great day.

Kindest Regards,

Alejandra Alvarez 
Administrative Assistant
Environmental Management Division
Department of Public Works
Phone: 909-387-8109
825 E. Third Street
San Bernardino, CA, 92415



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www.SBCounty.gov





Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

www.SBCounty.gov

Noel Castillo, P.E.
Directo

Byanka Velasco, P.E.
Assistant Directo

David Doublet, M.S., P.E.
Assistant Directo

November 5, 2025

Transmitted Via Email
File: 10(ENV)-4.01

City of Colton
Attn: Mario Suarez, Planning Manager
656 North 9th Street,
Colton, California 92324
msuarez@coltonca.gov

RE: NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE CITY OF COLTON HOUSING ELEMENT PROGRAM 10 AND 11 GENERAL PLAN AMENDMENT AND REZONING PROJECT

Dear Mr. Suarez,

Thank you for allowing the San Bernardino County Department of Public Works (DPW) the opportunity to comment on the above-referenced project. **We received this request on October 10, 2025**, and pursuant to our review, the following comments are provided:

Water Resources Division (Michael Fam, P.E., Engineering Manager), (909)-387- 8121:

1. The District's recommendations are most often made for site-specific conditions. Therefore, the recommendations made here are general in nature until such time as more detailed plans become available. | 1
2. According to the most recent FEMA Flood Insurance Rate Map (FIRM), Panel 06071C8679J, dated September 2, 2016, the project parcel lies within Zone X. | 2
3. If any encroachment on the San Bernardino County Flood Control District (District) right-of-way is anticipated, a permit shall be obtained from the District's Operations Division, Permits/Operations/Support Section. Other on-site or off-site improvements may be required, which cannot be determined at this time. | 3
4. We recommend that the December 1982 Comprehensive Storm Drain Plan Project #7 for the San Bernardino County Flood Control District, prepared by CM Engineering Associates, be utilized in the design of drainage facilities. | 4
5. A 6-foot block wall, chain link fence, or other Flood Control District-approved barrier shall be constructed along the Flood Control District's right-of-way adjacent to the southeast of this site. | 5

BOARD OF SUPERVISORS

COL. PAUL COOK (RET.)
First District

JESSE ARMENDAREZ
Second District

DAWN ROWE
Chairman, Third District

CURT HAGMAN
Fourth District

JOE BACA, JR
Vice Chair, Fifth District

Luther Snoke
Chief Executive Officer

NOA of a Draft EIR for City of Colton Housing Element Program 10 And 11 General Plan
Amendment and Rezoning Project
November 4, 2025
Page 2 of 2

Flood Control Planning Division (Michael Fam, P.E., Engineering Manager), (909)-387-8121:

1. Portions of the project site are adjacent to or within Flood Control District right of way and/or facilities. Any proposed encroachments, including access for grading, side drain connections, or utility crossings, will require an encroachment permit from the San Bernardino Flood Control District (SBCFCD) prior to construction. For permit processing information, please contact the SBCFCD Permit Section at 909-387-7995. | 6

2. If acquisition of Flood Control District property is required, the project proponent must contact Samuel Ochoa, Survey Division Chief, County Surveyor's Office, at 909-387-7910 for assistance with the property acquisition process. | 7

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing DPW the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individual who provided the specific comment, as listed above. | 8

Sincerely,

Nancy Sansonetti

NANCY J. SANSONETTI, AICP
Supervising Planner
Environmental Management Division

NS:AS:aa

Cc: Ayida Smith

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San Bernardino County Public Works (SBCPW)

Response to SBCPW-1

This comment consists of introductory remarks and does not include any comments related to the analysis provided in the Draft Program EIR. Therefore, no response is required.

Response to SBCPW-2

As disclosed in the Draft Program EIR, Section 3.9, page 3.9-30, many of the parcels undergoing rezoning for the Program 10/11 Rezone/GPA are located within or in proximity to 100-year and 500-year flooding zones.²⁴ Portions of Areas 1-A, 4, 4-A, and 5 are located within a 500-year flood plain, and Area 5 also encompasses a 100-year flood plain that is restricted by the Warm Creek bypass channel. Future development projects would be evaluated for flood hazards at the time development is proposed.

Response to SBCPW-3

Future development projects would be evaluated for potential impacts. The City confirms that if any encroachment on the San Bernardino County Flood Control District (District) right-of-way is anticipated, a permit will be obtained from the District's Operations Division, Permits/Operations/Support Section.

Response to SBCPW-4

All drainage improvements in the City must be designed in accordance with the most current and applicable County, City, and State standards and are subject to review and approval by the appropriate agencies. This comment will be considered by the City decision-makers during the review of any future development proposals.

Response to SBCPW-5

The City acknowledges that any development adjacent to the Flood Control District's right-of-way must comply with the District's standards for fencing or barriers. Future development proposals will be reviewed by the City to ensure compliance with all applicable requirements. No further environmental analysis is required, as this comment does not identify any information that would result in new or more severe environmental impacts beyond those already analyzed in the Draft Program EIR.

Response to SBCPW-6

Please refer to Response to SBCPW-3 regarding encroachment permits.

Response to SBCPW-7

Property acquisition is beyond the purview of CEQA. Therefore, no response is required. However, this comment will be considered by the City decision-makers.

Response to SBCPW-8

This comment consists of closing remarks and a request to be included on the circulation list for future notices. The commenter's contact information will be added to the distribution list.

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From: Liao, William <WLiao@socalgas.com>
Sent: Monday, October 13, 2025 9:32 AM
To: Mario Suarez <msuarez@coltonca.gov>
Cc: SCG SE Region Redlands Utility Request
<SCGSERegionRedlandsUtilityRequest@semprautilities.com>
Subject: FW: Housing Element Program 10 & 11 General Plan Amendment and Rezoning

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Hi Mario.

I just reviewed the city letter regarding the rezoning efforts across the City of Colton (The City).

SoCalGas has many existing facilities all throughout The City, ranging from medium-pressure services to large diameter transmission lines. Please help us ensure everyone's safety by requiring 811/DigAlert to be contacted prior to any excavation and/or demolition activities so that we can get out to Locate & Mark out our facilities.

Please let me know if you have any questions.

Will Liao

Region Planning Supervisor
Redlands HQ / Southeast Region
Mobile: 840-213-5899

From: Liao, William <WLiao@socalgas.com>
Sent: Monday, October 13, 2025 9:22 AM
To: Liao, William <WLiao@socalgas.com>
Subject:

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Southern California Gas Company (SOCALGAS)

Response to SOCALGAS-1

This comment provides general information about 811/DigAlert and does not provide any comments on the Draft Program EIR. The issue raised pertains to standard construction practices and is not related to the environmental analysis. Therefore, no response is required.

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General Call from Apartment Owner along East Santo Antonio

From Mario Suarez <msuarez@coltonca.gov>
Date Mon 10/20/2025 1:42 PM
To Alison Rondone <arondone@fcs-intl.com>; Cecilia So <cso@fcs-intl.com>
Cc Heidi Duron <hduron@coltonca.gov>

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His concern was related to removal of section 8 housing in the area.

He was informed that the proposal was for a GPA/Rezoning and does not impact Section 8 or other areas other than those vacant sites noted in the public notice.

The reason he received the notice is because he was in radius of noticing for such change on adjacent properties.

No further questions.

Mario

Mario Suarez, AICP, CNU-A
Planning Manager
909.370.5523 Desk
msuarez@coltonca.gov

Happy October/November 2025!

Development Services Department Planning Division

659 N. La Cadena Drive, Colton, CA 92324

Office Hours: Mon-Thursday Public Counter Hours 7:30 a.m. to 5:00 p.m.

Standard Office hours Mon-Thursday from 7:00 a.m. to 6:00 p.m.

Website: <https://www.ci.colton.ca.us/782/Planning-Division>

Directory of Phone Numbers and Contact Information:

<https://www.ci.colton.ca.us/directory.aspx?did=21>



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Individuals

Apartment Owner (OWNER)

Response to OWNER-1

Please see Master Response 1 regarding inquiries about individual properties. The comment does not raise any specific environmental issues or identify concerns regarding the analysis, conclusions, or adequacy of the Draft Program EIR.

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Letter from property owners at Hert and Congress in support of GPA/Rezoning and Text Amendments.

From: Ravneet Gill <gl.gdevelopmentllc@gmail.com>

Sent: Wednesday, October 15, 2025 2:51 PM

To: Mario Suarez <msuarez@coltonca.gov>

Cc: Devin Gill <dvngill@yahoo.com>

Subject: City of Colton - Upzoning Support Letter

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Mario,

It was a pleasure speaking with you earlier today.

We received your letter in regards to the upzoning, as well as, I appreciate you sharing the details regarding the City Council meeting on January 13th, 2026, concerning the proposed upzoning in key areas of Colton. I'm fully supportive of these changes and have attached a formal letter addressed to the Mayor and Council Members expressing that support.

I'd be grateful if you could please forward it as a support letter from a local business owner and property developer.

Respectfully,

Ravneet

Ravneet Gill
371 S. La Cadena Dr.
Colton, CA 92324
gl.gldevelopmentllc@gmail.com
October 15, 2025

City of Colton
Attn: Honorable Mayor and City Council Members
650 N. La Cadena Drive
Colton, CA 92324

Subject: Support for General Plan and Rezoning Text Amendments to Promote Housing Growth

Dear Mayor and Council Members,

I am writing to express my full support for the General Plan Amendment and Rezoning Text Amendments that allow increased residential density within Colton's Mixed Use Downtown and R3/R4 zones. These updates are vital to positioning Colton for sustainable growth and long-term economic prosperity.

Upzoning has consistently proven to strengthen local economies across California. Studies show that for every 100 new housing units built, approximately 150 local jobs are created. Higher-density development also supports small businesses by bringing more residents and foot traffic to nearby shops and restaurants.

As a local business owner and property developer here in Colton — through Sombrero Market and GL&GL Enterprises LLC (Development) — I've seen firsthand how new growth and investment can energize our community. Expanding housing opportunities will help attract new families, support local businesses, and create a stronger foundation for the city's future.

By supporting these amendments, Colton is taking a balanced approach — promoting affordability, expanding the tax base, and encouraging responsible development that benefits the entire community. I commend the Council for its leadership and commitment to progress.

Respectfully,

Ravneet Gill



Ravneet Gill (GILL)

Response to GILL-1

This comment expresses support for the proposed project. This comment is noted and will be considered by the City decision-makers during their review of the proposed project.

Response to GILL-2

This comment expresses support for the proposed project due to concerns about sustainable growth and economic development. This comment is noted and will be considered by the City decision-makers during their review of the proposed project.

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Telephone Call - Ricardo Ibarra

From Mario Suarez <msuarez@coltonca.gov>
Date Thu 10/16/2025 12:25 PM
To Alison Rondone <arondone@fcs-intl.com>; Cecilia So <cso@fcs-intl.com>
Cc Heidi Duron <hduron@coltonca.gov>

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Hello:

Received a call from a property owner – Ricardo Ibarra.
His inquiry was general as to whether his property was subject to change.

His property is located north of “O” Street and not within the proposed project changes; however, within the radius of the public noticing informing him of the changes along S. La Cadena Drive and S. 7th Street.

No further questions.

Mario Suarez, AICP, CNU-A
Planning Manager
909.370.5523 Desk
msuarez@coltonca.gov

Happy October/November 2025!

Development Services Department
Planning Division

659 N. La Cadena Drive, Colton, CA 92324

Office Hours: Mon-Thursday Public Counter Hours 7:30 a.m. to 5:00 p.m.

Standard Office hours Mon-Thursday from 7:00 a.m. to 6:00 p.m.

Website: <https://www.ci.colton.ca.us/782/Planning-Division>

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Ricardo Ibarra (IBARRA)

Response to IBARRA-1

Please see Master Response 1 regarding questions about individual parcels. The comment does not raise any environmental issues or concerns regarding the analysis, conclusions, or adequacy of the Draft Program EIR.

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Via Electronic Mail

November 17, 2025

City of Colton
Attn: Heidi Duron, Development Services Director
Development Services Department
Planning Division
659 N. La Cadena Drive
Colton, CA 92324
Email: hduron@coltonca.gov

Re: Comments on Draft Program EIR — *Housing Element Implementation, Programs 10 & 11 (General Plan Amendment and Rezoning, Citywide)* – 1691 S. Auto Center Dr., San Bernardino

Dear Ms. Duron:

This firm represents Transportation Development LLC (“TD, LLC”) with respect to its ownership of an approximately 14.12-acre industrial property located at 1691 S. Auto Center Drive (the “Property”) in the City of San Bernardino (“San Bernardino”), which has long been permitted and utilized as an outdoor storage, truck, and trailer parking facility in the Commercial General zone. The Property lies immediately adjacent to the City of Colton’s (“Colton”) boundary along the E. Fairway Drive / S. Auto Center Drive corridor, within a well-established goods-movement district that serves the I-215 / I-10 freight network and the BNSF San Bernardino Intermodal Yard. On behalf of TD, LLC, we respectfully submit this comment letter regarding Colton’s Draft Program Environmental Impact Report for Housing Element Implementation, Programs 10 & 11 (General Plan Amendment and Rezoning) (the “Project”). We request that this comment letter be included in the administrative record.

We appreciate the City’s continuing efforts to implement its Housing Element and to advance regional housing production goals. However, it is deeply concerning that the proposed Project identifies E. Fairway Drive and the adjacent S. Auto Center corridor—directly across from TD, LLC’s Property—as an area for potential high-density residential or mixed-use development. That proposal would introduce new sensitive receptors within a commercially zoned area with several existing intensive industrial and commercial operations (and very close to two major

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freeways), without any supporting technical analysis demonstrating that such adjacency can be achieved safely or compatibly.

As described in greater detail below, the Property is a paved, fenced, and illuminated industrial yard that has lawfully supported freight-related use for almost a decade, with entitlements allowing truck and trailer storage, unrestricted 24/7 truck trips, and three-level container stacking. It is among the few remaining heavy-capacity logistics sites in the I-215 corridor and forms part of a regional freight ecosystem essential to the Inland Empire’s employment base and goods-movement economy. Allowing high-density residential uses across from this facility—and other adjacent industrial sites, **including the abutting approximately 179,000-square-foot warehouse at 1601 Fairway Avenue which the City of Colton itself approved and allowed to be constructed as recently as 2017 and the very recent truck charging facility directly adjacent to the site South of Fairway Avenue**—would undermine the existing industrial and warehousing framework, expose future residents to noise, idling, emissions, and continuous nighttime operations, and predictably lead to conflicts and nuisance complaints directed at a lawful industrial uses located within and outside Colton’s jurisdiction.

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While we understand and support the City’s intent to satisfy its housing obligations, responsible planning requires that new housing be sited with the same level of care and technical rigor that now governs the siting of logistics facilities relative to residential neighborhoods under recent State legislation. The governing principle is straightforward: separation and buffering—not direct adjacency—remain the only proven means to protect residents from industrial impacts and to preserve the viability of existing industrial uses.

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For these reasons, and as explained in detail below, TD, LLC respectfully urges the City to remove the Fairway Drive / S. Auto Center corridor from residential eligibility under Programs 10 and 11. If the City nonetheless elects to proceed, it must at minimum adopt objective, measurable buffer distances and building-performance standards that ensure new housing will not be placed within harm’s reach of established freight operations. Given the cross-jurisdictional nature of this corridor, we further encourage the City to coordinate with the City of San Bernardino and the South Coast Air Quality Management District to develop appropriate interface standards and mitigation before the Project proceeds to adoption.

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1. Property Background and Existing Industrial Context.

The Property is located along the S. Auto Center Drive corridor, immediately east of the Colton city boundary, and forms part of a continuous band of industrial and logistics-oriented development extending through both jurisdictions. This corridor has historically supported automotive, warehousing, and freight transportation uses due to its strategic location near the I-215/I-10 interchange and its proximity to the BNSF San Bernardino Intermodal Yard, which lies approximately four miles to the west. These conditions have made the area a critical node within the

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Inland Empire’s goods-movement network, serving as a staging and transfer area for regional and interstate freight.

The Property itself is a fully improved, heavy-capacity parking yard encompassing roughly 14.12 acres, with a graded and paved surface, perimeter fencing (partially electric), and full site lighting to support secure, 24-hour operations. The site includes a modular administrative office structure and has been permitted for and has operated for truck and trailer storage, around the clock truck operation, and three-level container stacking.

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CONT

The surrounding area on the San Bernardino side of the jurisdictional boundary consists almost exclusively of commercially zoned parcels, many with existing industrial uses, including automotive service facilities, freight yards, and small distribution sites. On the Colton side, the land along E. Fairway Drive is similarly characterized by light industrial and service commercial uses, and until now, has never been considered appropriate for high-density residential development. In fact, as noted above, as recently as 2017 the City of Colton approved and authorized the construction of a nearly 200,000 square foot warehouse located at 1601 Fairway Avenue abutting TD, LLC's Property. The City’s recent proposal under Programs 10 and 11 would therefore represent a fundamental departure from the historic and planned industrial function of this corridor.

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It is important to emphasize that this portion of the I-215 corridor does not merely host isolated industrial uses—it constitutes part of a regional goods-movement system recognized in multiple planning documents as essential to Southern California’s freight economy. Both the Southern California Association of Governments (SCAG) and the San Bernardino County Transportation Authority identify the I-10/I-215 corridor as a primary goods-movement route supporting the flow of cargo between the Ports of Los Angeles and Long Beach, the Inland Empire’s warehouse distribution centers, and points east throughout the United States. Within this context, properties such as 1691 S. Auto Center Drive play an important logistical role by providing lawful, entitled locations for truck staging, container storage, and fleet operations proximate to freeway access points.

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The City’s Housing Element rezoning program, if applied to the Fairway Drive frontage, would thus introduce new residential development directly into the core of an established freight corridor—an area designed and improved to accommodate industrial uses, commercial uses, and heavy-duty truck circulation. The introduction of high-density housing at this location would not only contradict existing land-use patterns but also disrupt the functional integrity of a critical segment of the region’s goods-movement network.

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2. Summary of Colton’s Proposed Housing Element Implementation Project and Fairway Drive Rezoning

According to the City of Colton’s Draft EIR for the Housing Element Implementation, Programs 10 and 11 (General Plan Amendment and Rezoning) (SCH No. 2025010520), the City proposes to rezone approximately 89.9 acres of land across six areas of the City to meet its 2021–2029 Regional Housing Needs Assessment (“RHNA”) obligations. The Project would modify both the General Plan Land Use Map and the Official Zoning Map to introduce new high-density residential and mixed-use designations in locations previously reserved for commercial and industrial use. The Draft EIR identifies the Fairway Drive corridor—directly across from TD, LLC’s property at 1691 S. Auto Center Drive—as one of these key rezone areas (Areas 4, 4-A, and 5).

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Under the proposed amendments:

- Existing industrial land along the north side of E. Fairway Drive, historically zoned *Industrial Park (I-P)* and improved for light-industrial and logistics operations, would be redesignated to the Mixed-Use Downtown (M-U/D) or Mixed-Use (MU) land-use categories.
- These categories would permit up to 40 dwelling units per acre and allow 100 percent residential use under the updated mixed-use standards. Separately, projects that include at least 20 percent lower-income units on qualifying rezoned sites must be processed by-right with no public approval process required.
- No buffers, transitional setbacks, or screening requirements are included in the Draft EIR or the companion zoning-text amendments to separate new residential construction from adjacent heavy industrial or freight-handling uses.
- The Draft EIR expressly acknowledges that the affected Fairway Drive parcels total more than 30 acres of former *Industrial Park* land that the City now proposes to up-zone for residential or residential-dominant mixed use.

In practical terms, this means that parcels along the E. Fairway Drive frontage—generally between Iowa Avenue and Crossroads Drive—would be newly eligible for multi-story apartment or mixed-use projects, directly opposite the Auto Center corridor where TD, LLC’s freight operations are located. Figure 2-6 of the Draft EIR confirms that Areas 4 and 5 encompass the frontage opposite and adjacent to the Property. These are the very sites that would introduce substantial new high-density residential uses into a corridor long dominated by industrial and freight purposes.

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The City’s stated objective is to “increase the inventory of land available for the development of new housing” and to “up-zone its Mixed-Use Downtown zoning designations to

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allow up to 40 du/acre and its R3/R4 zone to 30 du/acre.” (Draft EIR pp. 1-31 to 1-32.) Yet nowhere does the Draft EIR acknowledge that the Fairway Drive corridor lies within the industrial hub abutting the intersection of the I-215 and I-10 freeways, immediately adjoining the region’s freight network and directly facing active truck-intensive uses, including TD, LLC’s Property. If adopted as written, the Project would therefore:

1. **Introduce high-density housing** into an established industrial district at one of the Inland Empire’s busiest logistics nodes; 11
2. **Eliminate existing industrial designations** that currently protect freight uses and ensure compatible land-use separation; and 12
3. **Authorize sensitive residential receptors** within yards of ongoing truck staging, diesel emissions, and 24-hour industrial activity—without a single objective standard governing separation, filtration, or noise attenuation. 13

In short, the City proposes to convert the Fairway Drive frontage opposite S. Auto Center Drive from industrial to residential use despite its location at the literal intersection of the I-215 and I-10 corridors—a critical goods-movement hub where industrial uses predominate. This is the context in which TD, LLC submits the following comments and objections. 14

3. CEQA Comments: Industrial–Residential Interface Conflicts and Fundamental Planning Error.

The Draft EIR fails to confront the glaring, site-specific incompatibilities it would create along the E. Fairway Drive / S. Auto Center Drive corridor. In simple terms, the proposal to designate this freight corridor for high-density residential or mixed-use development is not just unsound planning—it is *planning malpractice*. The area in question lies at the confluence of two of Southern California’s most heavily trafficked industrial arteries, the I-215 and I-10 corridors, forming part of a regional logistics hub that connects directly to the BNSF San Bernardino Intermodal Yard and serves as a core component of the Inland Empire’s goods-movement network. 15

Colton’s proposal would place multi-story residential buildings directly opposite a fully built-out, heavy-capacity truck and container storage yard—an established industrial use that operates continuously, with unrestricted truck trips, diesel equipment, and three-high container stacking—within a corridor expressly planned, constructed, and relied upon for industrial and freight activity. Treating this frontage as ripe for “mixed-use” housing opportunities ignores every accepted tenet of land-use compatibility and environmental health planning. The Draft EIR’s approach, which (i) treats the Fairway/Auto Center frontage as fungible acreage for housing capacity, (ii) relies on generic, citywide conclusions divorced from actual conditions on the ground,

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and (iii) omits any enforceable locational or corridor-specific buffers controls standards, is indefensible as a matter of both CEQA compliance and professional planning judgment.

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CONT

a. Siting Sensitive Receptors in a Freight Impact Zone is Inherently Irresponsible

Under CEQA, the act of siting new residents adjacent to existing sources of substantial emissions, noise, and vibration constitutes a project-level environmental impact. Here, the Project would, by legislative action, encourage thousands of new residents to occupy parcels directly across from, and downwind of, a functioning freight-handling yard. This is not an abstract risk; it is a guaranteed exposure scenario involving mobile emissions, high decibel levels, and 24-hour heavy-duty truck activity.

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Doing so disregards the State’s own planning guidance under SB 1000 and AB 617, which call for the separation—not co-location—of sensitive receptors and freight operations. CEQA requires disclosure and mitigation commensurate with that known risk, yet the Draft EIR ignores the basic premise that adjacency itself creates the impact.

b. The Draft EIR’s Findings Confirm the Problem—and Then Excuse It

The Draft EIR openly concedes that the Project will cause significant and unavoidable regional emissions of ROG, NOx, PM10, and PM2.5 and will expose new “sensitive receptors” to substantial localized concentrations of diesel particulate matter. Nonetheless, the City relies on deferred, discretionary “best practices” and later, case-by-case health-risk assessments that cannot meaningfully mitigate those impacts at the plan level. By failing to adopt enforceable, objective corridor-specific buffers or receptor-placement control standards now, the City is effectively approving the conflict it is duty-bound to prevent. In this context, the omission of any fixed-distance setback, receptor-placement standard, or frontage restriction is not merely a procedural oversight—it is a substantive failure to meet CEQA’s mandate to adopt all feasible mitigation measures.

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c. Ignoring Nighttime Freight Noise Compounds the Error

The Fairway/Auto Center corridor functions around the clock. Freight yards, truck staging, and container handling generate intermittent, tonal, and high-intensity noise events incompatible with multifamily residential occupancy. The Draft EIR’s reliance on interior noise insulation or future acoustical studies trivializes the magnitude of this incompatibility. No amount of window glazing will prevent sleep disturbance when truck brakes, coupling impacts, or backup alarms occur throughout the night, nor will façade improvements mitigate the predictable wave of nuisance complaints that will follow. In short, the Draft EIR sanctions a conflict that CEQA and common-sense planning are intended to avoid.

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d. The Draft EIR’s Land-Use Analysis Disregards the Corridor’s Regional Role

Finally, the Draft EIR’s land-use consistency discussion ignores that the Fairway/Auto Center corridor functions as a critical industrial hub recognized in SCAG’s regional freight planning documents and the County’s transportation network. To reclassify this industrial frontage for residential use without even acknowledging, much less addressing, its role in the regional goods-movement system is an abdication of basic planning responsibility. Such an action would not only disrupt coordinated regional policy but would invite inevitable operational conflicts between new residents and long-established freight operators. 19

4. Broader Planning and Policy Implications; Recommended Revisions

Beyond its clear CEQA deficiencies, the City’s proposal reflects a profound breakdown in fundamental planning judgment. The Fairway Drive / Auto Center corridor is not a speculative infill area—it is a built-out industrial logistics spine that anchors the I-215 / I-10 interchange, one of the most active freight nodes in Southern California. Introducing high-density residential or residential-dominant “mixed-use” projects at this location would undo decades of coordinated regional investment in goods-movement infrastructure and would jeopardize the long-term employment and fiscal stability that the corridor provides to both Colton and San Bernardino. 20

The City’s own General Plan, together with SCAG’s Connect SoCal regional transportation plan and the San Bernardino County Transportation Authority’s freight-mobility framework, recognizes this corridor as a critical component of the Inland Empire’s industrial economy—designed to accommodate high-intensity truck circulation with direct freeway ingress and egress. Reversing course now by inserting multi-story housing into the center of that freight system is not merely poor planning; it is planning malpractice. The foreseeable result will be incompatible land uses, diminished industrial viability, and ongoing conflict between new residents and the established operators who have invested and operated lawfully in reliance on the corridor’s industrial designation. 21

If, despite the above, the City believes it is compelled—whether by perceived Housing Element mandates or political pressure—to proceed with residential entitlements in this corridor, it must do so only with the highest level of technical rigor and enforceable safeguards. Anything less would constitute a dereliction of the City’s statutory responsibilities under CEQA and its own planning mandate to ensure orderly and compatible development. At minimum, those safeguards must include quantifiable buffer distances, orientation standards, and building-performance measures that physically and operationally separate residential occupants from freight and heavy industrial activity, together with binding disclosure and right-to-operate covenants protecting existing industrial uses from nuisance or enforcement risk. Absent such measures, the City will 22

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have created a self-inflicted conflict zone that invites litigation, enforcement exposure, and long-term economic harm to the region’s logistics base.

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CONT

Requested Corrections and Actions: To bring the Project into compliance and to avoid predictable industrial–residential conflict at the Fairway/Auto Center interface, the City should revise and, if necessary, recirculate the Draft EIR and/or discuss in the staff report for this item to mandate the following :

- **Adopt objective, corridor-specific siting standards** applicable to all parcels fronting E. Fairway Drive opposite established heavy-duty freight yards and truck staging areas, including:
 - A minimum separation/buffer between any new residential building (or outdoor private/common open space) and the edge of any truck/trailer storage, container yard, or designated truck-route frontage sufficient to address localized diesel and noise exposure (e.g., a fixed-distance buffer or a “no-residential-frontage” prohibition facing freight operations).
 - A frontage-configuration standard requiring any residential-mixed-use to place non-habitable, commercial, or structured-parking elements along freight-facing frontages, with all habitable rooms and private open space oriented away from the corridor.
 - Prohibited ground-level residential and outdoor residential amenities (balconies, patios, play areas, roof decks) along the freight-facing frontage within the buffer distance.
 - Freight-compatible site planning, including internalized courtyards, building massing as shielding, and truck-plume-aware air-intake locations.
- **Commit to enforceable health-protective building performance** where residential is still allowed near freight, including at minimum:
 - High-efficiency filtration (e.g., MERV-16 or higher) with mechanically supplied, filtered make-up air sized for windows-closed operation and long-term maintenance plans recorded as conditions of approval.
 - Verified envelope performance (air-tightness/pressurization) and HVAC commissioning to ensure modeled filtration actually protects residents in use.
 - Acoustical performance targets addressing interior and exterior private-use areas, and prohibitions on locating outdoor residential amenities within noise impact zones that cannot meet objective criteria without extraordinary measures.

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- Disclosure/covenant requirements informing future occupants of the industrial context and recorded right-to-operate protections for existing industrial/freight facilities to minimize nuisance-based curtailment of lawful operations. | 26
- **Provide a corridor-specific CEQA analysis** that evaluates localized pollutant concentrations (including DPM) and health risk under a conservative freight-adjacency scenario, and then ties the buffer and building-performance standards to the analytical outcomes rather than leaving health protection to future discretionary reviews. | 27
- **Coordinate cross-jurisdictionally** with the City of San Bernardino and the South Coast AQMD to establish shared industrial-residential interface standards for the Fairway/Auto Center edge, so that the two cities’ regulatory approaches are aligned and do not produce incompatible, complaint-driven outcomes. | 28

Absent these concrete, enforceable measures embedded in the plan-level approvals, the Project will, as applied to the Fairway/Auto Center frontage, (i) authorize substantial, foreseeable exposures of new residents to industrial emissions and noise, (ii) set up severe land-use conflicts that predictably pressure a lawful industrial operation located outside Colton’s jurisdiction, and (iii) fall short of CEQA’s mandate to adopt feasible mitigation commensurate with the identified risks. TD, LLC respectfully requests that the City correct these deficiencies and either remove the Fairway/Auto Center frontage from Programs 10 and 11 or adopt the objective siting and performance standards described above and recirculate the Draft EIR accordingly. | 29

5. Conclusion |

In summary, the Draft Program EIR fails to meet CEQA’s fundamental requirement of full disclosure and mitigation of foreseeable environmental and land-use conflicts. It does not identify, analyze, or mitigate the incompatible interface it would create between long-established industrial and freight operations and the newly proposed high-density residential uses along the E. Fairway Drive corridor. The City’s current approach—treating this corridor as interchangeable housing acreage rather than as a regional freight artery—is not only factually unsupported but legally indefensible. | 30

The City must recognize that the I-215 / I-10 logistics district is not a discretionary land bank available for housing reallocation; it is an indispensable component of the Southern California freight network and an economic engine for the region. Reclassifying that area for residential use—without any corridor-specific analysis, buffer standards, or enforceable protections for existing industry—invites physical incompatibility, public-health exposure, and protracted interjurisdictional conflict. | 31

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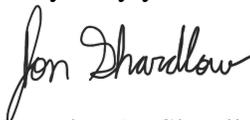
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A final EIR that fails to meaningfully address these issues would be vulnerable to challenge under Public Resources Code sections 21002 and 21081 for failure to adopt all feasible mitigation measures, and under CEQA Guidelines sections 15126.2 and 15162 for omitting analysis of foreseeable, site-specific impacts. Courts have repeatedly held that lead agencies may not approve projects that create known health or compatibility hazards for new sensitive receptors—particularly where those hazards arise from preexisting, lawful industrial uses. Colton’s proposal, as applied to the Fairway Drive / Auto Center corridor, is precisely the kind of ill-considered zoning action that CEQA was enacted to prevent. 32

TD, LLC respectfully requests that the City take the following actions before proceeding to certification or adoption: 33

1. **Remove the Fairway Drive / Auto Center corridor** from residential eligibility under Programs 10 and 11, recognizing its regional freight significance and incompatibility with high-density housing; or 33
2. **Recirculate the Draft EIR** with a corridor-specific analysis and objective mitigation framework addressing industrial–residential interface conditions, including enforceable corridor-specific buffer, filtration, and right-to-operate provisions; and 34
3. **Engage in formal interjurisdictional consultation** with the City of San Bernardino, the South Coast Air Quality Management District, and the San Bernardino County Transportation Authority to ensure any future planning in this corridor aligns with regional goods-movement objectives and air-quality standards. 35

TD, LLC is committed to being a constructive participant in this process and stands ready to provide additional data regarding existing freight activity, operational characteristics, and potential buffer methodologies to inform a more responsible and defensible planning outcome. We appreciate the opportunity to provide these comments and look forward to continuing to work constructively with the City regarding the Project. 36

Very truly yours,

Jonathan E. Shardlow

cc: Transportation Development LLC (via e-mail only)

Allen Matkins (MATKINS)

Response to MATKINS-1

This comment consists of general introductory remarks and a summary of the proposed project. The comment requests inclusion of the letter in the administrative record. This letter is included in the Final EIR and is therefore part of the public record. Responses to specific comments are provided below.

Response to MATKINS-2

The commenter expresses concern about the location of the project site across from the Transportation Development LLC (TD, LLC) property in an area with industrial and commercial land uses.

A City's decisions regarding land use, such as zoning changes, general plan amendments, or updates to the housing element, are fundamentally policy-level decisions, not environmental decisions. As such, these policy decisions reflect the City's legislative authority to determine how land within its jurisdiction should be used to meet community needs and goals. These decisions are based on broad considerations such as economic development, housing needs, community character, and long-term planning objectives. They are made by elected officials (e.g., City Council) as a matter of public policy. As such, to the extent the comment raises issues with the City's policy decisions, those comments are not related to potential impacts on the physical environment but will be forwarded to the City's elected decision-makers, the City Council.

The Draft Program EIR includes detailed analyses of noise (Section 3.12), air quality (Section 3.2), and land use compatibility (Section 3.10). Though not required by CEQA, as environmental review is only required to evaluate the impact of a project on the environment, not the impact of the environment on a project, the analyses address the potential for future residents to be exposed to noise, idling, emissions, and continuous nighttime operations from adjacent or nearby industrial and warehousing uses. General land use compatibility is evaluated in the CEQA analysis in Section 3.10, Land Use and Planning; Section 3.12, Noise; Section 3.2, Air Quality; and Section 3.16, Transportation. As discussed in the Draft Program EIR, Section 3.10, Land Use and Planning, the majority of the identified sites are currently zoned Commercial or Industrial Park and are vacant or underutilized. Most of the shortfall in very low/low-income affordable housing (up to 1,013 units) would be addressed through rezoning of vacant Industrial Park properties along Fairway Drive (Draft Program EIR, Section 3.10, page 3.10-2). As explained in the Draft Program EIR, the potential sites for rezoning were chosen by the City based on certain criteria that the City has determined make these sites suitable for residential development (page 3.10-8). These include areas close to commercial areas and transit, consistent with General Plan Policy LU-8.4. Furthermore, General Plan Policy H-4.2 encourages development of residential uses in strategic proximity to employment, recreational facilities, schools, neighborhood commercial areas, and high-quality transportation corridors. Therefore, the City was consistent with the General Plan's Land Use element when it selected the potential sites for rezoning along existing transportation corridors and on vacant and underutilized sites (Draft Program EIR, Section 3.10, page 3.10-8 and 3.10-9).

The commenter does not provide substantial evidence supporting a different significance conclusion in the Draft Program EIR. For example, the commenter states that the exposure of future residents

to existing industrial noise sources is not included in the Noise analysis. However, as a general rule, CEQA does not require analysis of the impact of existing environmental conditions on a proposed project. Instead, CEQA's analysis, and the focus of this EIR, is on the proposed project's impact on the environment, not the environment's impact on the proposed project. As the court explained in *California Bldg. Indus. Ass'n. v Bay Area Air Quality Mgmt. Dist.* (2015) 62 C4th 369, 377:

In light of CEQA's text, statutory structure, and purpose, we conclude that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must evaluate the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment—and not the environment's impact on the project—that compels an evaluation of how those future residents or users could be affected by exacerbated conditions.

Although future residents may be exposed to noise, the proposed project itself would not exacerbate those existing environmental conditions and as such, evaluation under CEQA is not required. Additionally, future development projects within the Program 10/11 Rezone/GPA area would be required to undergo a design review analysis at the project level to address potential impacts from existing industrial operations on future residential uses, consistent with CEQA requirements. Future development consistent with the proposed project would be required to implement applicable mitigation measures and adhere to the City's standard conditions of approval, as well as local, State and federal regulations. No additional analysis is required within this Draft Program EIR .

Response to MATKINS-3

The commenter states that buffering and separation are the only proven means to protect residents from industrial impacts. As discussed above, environmental compliance will be required at the time future site-specific development applications are received by the City (see Draft Program EIR, Chapter 1, page 1-34). Future development proposals will be reviewed for environmental compliance, including land use compatibility. The City's General Plan and Zoning Code require that new residential development adjacent to industrial uses incorporate design features to minimize conflicts. The City will continue to enforce these requirements at the project level. The City's policies and conditions of approval would continue to recognize the rights of existing lawful industrial uses to continue operations, consistent with applicable laws and regulations. The introduction of new residential uses will not, in itself, impose new operational restrictions on existing industrial businesses. The EIR requires that all feasible mitigation measures be implemented to reduce potential conflicts and complaints, including project-specific design, operational restrictions, and ongoing monitoring.

Therefore, this comment is noted, and no further analysis or mitigation measures are required. Please see Master Response 2 regarding the level of analysis for a Program EIR and future development proposals.

Response to MATKINS-4

The commenter requests the City to remove the Fairway Drive/ South Auto Center corridor from residential designation, or to implement buffer distances.

Removal of a particular site or sites included in the Program 10/11 Rezone/GPA would not reduce or eliminate a potentially significant impact or any significant and unavoidable impacts. Further, as discussed above, CEQA does not look at the impact of the environment on a project, just that of the project on the environment.

The commenter's request—which appears to be a policy, not a CEQA-based request—would not achieve the goal of utilizing vacant or underutilized sites along high-quality transit corridors (as discussed in Response to MATKINS-2). Specific project-level details, such as buffers, will be considered at the time that development applications are received by the City. Subsequent actions will be subject to design approval, which would address these issues.

Please see Master Response 2 regarding the level of analysis for a Program EIR and future development proposals.

Response to MATKINS-5

This comment characterizes the area being discussed in the comment letter as being in an industrial setting and does not comment on the adequacy of the analysis in the Draft Program EIR. No response is required.

Response to MATKINS-6

The commenter states that the area is industrial in nature, and that residential uses would be a “fundamental departure from the historic and planned industrial function of this corridor.”

This comment is noted for the record. Land use planning is a legislative function of the City, and the City has the discretion to make land use decisions.

Specific project-level details, including land use compatibility, will be considered at the time that development applications are received by the City. Please see Response to MATKINS-2, which describes how the City selected the sites being considered for rezoning as part of the Program 10/11 Rezone/GPA. Please see Master Response 2 as well as Response to MATKINS-4 regarding the level of analysis for a Program EIR and future development proposals.

Response to MATKINS-7

The commenter states that the area is part of a goods-movement network.

This comment is noted for the record. As is true now, if the proposed project is approved, the City's policies and conditions of approval would continue to recognize the rights of existing lawful industrial uses to continue operations, consistent with applicable laws and regulations. The proposed project would not impose new operational restrictions on existing industrial businesses. Land use compatibility of future proposed development projects will be considered at the time that development applications are received by the City. Please see Master Response 2 regarding the level of analysis for a Program EIR and future development proposals.

Response to MATKINS-8

The commenter states that the proposed project, specifically along Fairway Drive, would introduce incompatible land uses to this area.

This comment is noted for the record. As previously noted, land use planning is a legislative responsibility of the City, and it is within the City's authority to exercise discretion when making land use decisions. The proposed project is a policy level document and does not include any entitlements for specific development. Specific project-level details, including land use compatibility, will be considered at the time that development applications are received by the City. Future development proposals will be reviewed for environmental compliance, including land use compatibility.

Response to MATKINS-9

This comment consists of a detailed summary of the proposed project. No response is required.

Response to MATKINS-10

This comment expresses concern about the proposed land uses along the East Fairway Drive frontage between Iowa Avenue and Crossroads Drive.

This comment is noted for the record. The City's industrial history is documented in the EIR. See Section 3.10.2. Importantly, while the proposed project would allow for residential development in certain areas, it does not mandate such development or propose conversion of existing industrial uses. Impacts that may arise from existing uses on proposed future residential uses are outside the scope of CEQA review. Please see Response to MATKINS-2 regarding the land uses and Master Response 2 regarding the level of analysis for a Program EIR and future development proposals.

Response to MATKINS-11

The commenter claims that the proposed project would introduce high-density housing into an industrial district. Please see Master Response 2 regarding land use compatibility.

Response to MATKINS-12

The commenter claims that existing industrial designations will be eliminated. This comment does not identify any environmental impacts under CEQA that were not previously analyzed or adequately analyzed in the Draft Program EIR. Therefore, no further response is required. See Response to MATKINS-2 regarding the concerns about rezoning and the methods the City used to choose these sites.

Response to MATKINS-13

The commenter expresses concerns that there are no objective standards governing separation, filtration, or noise attenuation.

Subsequent actions will be subject to design approval, which could address concerns related to potential impacts of the existing environment on a future project, which are outside of CEQA. Please see Master Response 2 regarding the level of analysis for a Program EIR and future development proposals.

Response to MATKINS-14

The commenter provides a summary of the previous points. Please refer to Response to MATKINS-9 through Response to MATKINS-13.

Response to MATKINS-15

The commenter states that the proposed project would create incompatible uses along the East Fairway Drive/South Auto Center Drive corridor due to the industrial uses in the area. The commenter expresses specific concerns that multi-story residential buildings would be developed directly opposite a fully built-out, heavy-capacity truck and container storage yard.

First, this is a program-level EIR that does not propose any specific residential buildings or any other development projects. Second, subsequent actions will be subject to design approval and appropriate mitigation measures to address environmental issues (see Draft Program EIR, Chapter 1, page 1-34). Please see Master Response 2 for additional details regarding the level of analysis for a Program EIR and future development proposals. Additionally, please refer to Response to MATKINS-2 regarding rezoning of industrial sites to residential.

Response to MATKINS-16

While the Draft Program EIR contemplates development that would introduce sensitive receptors, the commenter's concerns regarding sensitive receptors are related to potential impacts of the existing environment on a future project, and thus are outside of CEQA. Future actions will be subject to design approval and will be required to address any potentially significant environmental issues (see Draft Program EIR, Chapter 1, page 1-34). Please see Master Response 2 for additional details regarding the level of analysis for a Program EIR and future development proposals.

Response to MATKINS-17

The commenter alleges that the air quality mitigation measures are deferred mitigation. Please see Master Response 2 for information regarding programmatic-level mitigation measures.

Response to MATKINS-18

The commenter expresses concerns about noise impacts to future residents. Please refer to Response to MATKINS-2.

Response to MATKINS-19

The commenter reiterates concerns about land use planning. The proposed project is a program-level analysis. Specific project-level details and environmental impacts will be considered at the time that development applications are received by the City and analysis of any environmental impacts of specific projects becomes possible. Please see Master Response 2 regarding the level of analysis for a Program EIR and future development proposals. Additionally, please refer to Response to MATKINS-2 regarding concerns about rezoning and the methods the City used to choose these sites.

Response to MATKINS-20

The commenter reiterates concerns about land use incompatibility. The proposed project is a program-level analysis. The City is required by State law to identify sufficient sites for housing as is addressed in the proposed project and Draft Program EIR. The City also recognizes the need to balance housing production with the preservation of critical employment centers and goods-

movement infrastructure. Accordingly, the Draft Program EIR describes a framework for the review of future projects that requires project-level review and mitigation to ensure continued recognition of the role of key industrial corridors. Specific project-level details and environmental impacts will be considered at the time that development applications are received by the City. As such, future development will be subject to rigorous project-level review to ensure compatibility with the corridor's established industrial character and maintain long-term economic stability. Please see Master Response 2 regarding the level of analysis for a Program EIR and future development proposals and Response to MATKINS-2 regarding the City's land use and zoning decisions.

Response to MATKINS-21

The commenter reiterates concerns about land use incompatibility. The proposed project is a program-level analysis. Specific project-level details and environmental impacts will be considered at the time that development applications are received by the City and analysis of any environmental impacts of specific projects becomes possible. Additionally, concerns about industrial viability are not within the purview of CEQA, but these comments will be reviewed by the City planners for their consideration. Please see Master Response 2 regarding the level of analysis for a Program EIR and future development proposals and Response to MATKINS-2 regarding the City's land use and zoning decisions.

Response to MATKINS-22

The commenter alleges that the proposed project includes "residential entitlements." The proposed project does not contain any entitlements or proposals. Additionally, as explained further in Master Response 2, project-level details such as quantifiable buffer distances, orientation standards, and building-performance measures are not required for a program-level CEQA document. A program-level EIR is not designed to analyze site-specific or project-specific environmental impacts or provide the level of detail found in a project-level EIR. No information is available for analysis of potential future site-specific projects.

Response to MATKINS-23

Project-level details will be evaluated at the time future development projects under the Housing Element Update are proposed. The comment proposes specific mitigation. As described throughout the Draft EIR, this document is a Program EIR prepared under CEQA to evaluate the potential environmental impacts of the City's Housing Element Update Program 10/11 Rezone and General Plan Amendment at a programmatic, policy level. No specific development projects are proposed or approved as part of this action.

Accordingly, the Draft Program EIR identifies mitigation measures that are to be applied and refined as appropriate when specific development projects are proposed in the future. Project-level environmental review will be required for subsequent development applications, at which time projects will undergo design review, site-specific impacts will be analyzed and projects will be required to mitigate any potentially significant environmental impacts, as explained in Master Response 2. This approach is consistent with CEQA Guidelines for Program EIRs (see CEQA Guidelines § 15168), which allow for later, more detailed environmental review and mitigation at the project level.

Response to MATKINS-24

Please see Response to MATKINS-23.

Response to MATKINS-25

Please see Response to MATKINS-23.

Response to MATKINS-26

Please see Response to MATKINS-23.

Response to MATKINS-27

The commenter does not provide any details that would warrant additional CEQA analysis. The comments do not provide substantial evidence as to why preparation of an additional CEQA document would reduce any of the proposed project's identified significant and unavoidable impacts or would be necessary to fulfill the project objectives. The Draft Program EIR provides a complete program-level analysis. Additionally, the proposed project as discussed in the Draft Project EIR for the proposed project would be consistent with local and regional planning. For example, it would implement the South Colton Livable Corridor Plan's recommendation for land use redesignation and would utilize vacant and underutilized sites near transportation corridors, which is consistent with the General Plan policies (Policy H-4.2). Therefore, a "corridor-specific CEQA analysis" is not required under CEQA.

Response to MATKINS-28

The City of Colton is committed to coordinating with other jurisdictions whenever it is relevant and appropriate. No further response is required.

Response to MATKINS-29

Specific project-level details and environmental impacts will be considered at the time that development applications are received by the City and project specific environmental impact analysis becomes possible. Please see Master Response 2 regarding the level of analysis for a Program EIR and future development proposals.

Response to MATKINS-30

This comment consists of concluding remarks summarizing the main topics outlined above with regard to the commenter's concerns about land use incompatibility and environmental impacts. Responses to the specific substantive comments about these concerns are provided in Response to MATKINS-1 through Response to MATKINS-29 above.

Response to MATKINS-31

The comment states that the area under discussion is not a "discretionary land bank available for housing reallocation." The commenter reiterates the concerns about land use incompatibility, health impacts, and conflicting uses.

Under California law, the Housing Element is a mandatory component of the General Plan and must identify adequate sites to meet the City's RHNA pursuant to Government Code Sections 65580–65589.11. For future development proposals on the sites identified by the Program 10/11 Rezone/GPA, the City may deny or condition a future project if the project would have a specific, adverse impact on public health or safety that cannot be mitigated.

The Program 10/11 Rezone/GPA has been developed to be largely self-mitigating, in that the policies and programs are designed to protect, preserve and enhance the environment and environmental resources. The proposed project does not approve or propose any specific development. Any future development would have to be consistent with the General Plan (including the Housing Element) and Municipal Code. In particular, the Housing Element Update is self-mitigating through implementation of comprehensive policies required for new development as described in Master Response 2). Additionally, as discussed throughout the Draft Program EIR, future development consistent with the proposed project would be required to conform to federal, State, and local policies.

As the City receives development applications for subsequent development, those applications will be reviewed by the City for compliance with federal, State, and local policies related to land use and planning, noise, and air quality. To the extent that there are site-specific or project-specific characteristics that require additional environmental review, the additional environmental review will be conducted at the time that the City is in receipt of a specific development application.

Response to MATKINS-32

The comment alleges that the Draft Program EIR failed to adopt all feasible mitigation measures. Please see Master Response 2 regarding mitigation measures at the Program EIR level.

Response to MATKINS-33

The commenter requests removal of the “Fairway Drive/Auto Center corridor from residential eligibility” due to land use compatibility. Please see Response to MATKINS-2 and Response to MATKINS-4.

Response to MATKINS-34

The commenter requests recirculation of the Draft Program EIR in order to include “a corridor-specific analysis” including objective mitigation with buffers, filtration, and right-to-operate provisions. As previously stated, the City’s policies and conditions of approval would continue to recognize the rights of existing lawful industrial uses to continue operations, consistent with applicable laws and regulations. None of the information presented in the comment letter requires changes to the Draft Program EIR. Nor does the comment letter identify any specific adverse environmental impacts or significant new information that would require substantial changes to the Draft Program EIR requiring recirculation. As explained above, the proposed project does not include any specific entitlements, and to the extent the comment letter suggests mitigation, those suggestions for project-specific mitigation would be appropriately considered when individual development applications are reviewed by the City. Please refer to Response to MATKINS-2, Response to MATKINS-3, and Response to MATKINS-4. Additionally, as discussed in Response to MATKINS-27, the commenter does not provide any details that would warrant additional CEQA analysis requiring recirculation. An additional CEQA document would not reduce any of the proposed project’s identified significant and unavoidable impacts and is not necessary to fulfill the project objectives.

Response to MATKINS-35

The commenter asks the City to engage in formal interjurisdictional consultation with the City of San Bernardino, South Coast Air Quality Management District (South Coast AQMD), and the San Bernardino County Transportation Authority (SBCTA).

The City is committed to coordinating with other jurisdictions whenever relevant and appropriate. As discussed in detail throughout Section 3.2, Air Quality, the project's significant and unavoidable Air Quality impacts were found to be significant and unavoidable based on the South Coast AQMD thresholds, and MMs MM AQ-2a and MM AQ-2b were included as a result of these thresholds. Therefore, the proposed project has engaged with the applicable goals of the South Coast AQMD as required by CEQA. Additionally, the Colton ATP Objective 1.1 specifies that the City will work with SBCTA and surrounding jurisdictions to achieve bicycle infrastructure consistency. General Plan Policy LU-20.9 emphasizes that development plans facilitate bicycle use. The proposed project would increase opportunities for future development to provide available land for residential developments in Commercial/downtown areas, which would facilitate bicycle use. As such, the proposed project is consistent with the planning efforts of regional plans and other jurisdictions. The commenter does not provide any additional details that were not already considered in the Draft Program EIR that would indicate that the proposed project is not consistent with the requirements or policies of other jurisdictions. Therefore, no further response is required.

Response to MATKINS-36

This comment consists of concluding remarks. No response is required.

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Colton Resident Call in - General Comments Along Fairway Drive changes

From Mario Suarez <msuarez@coltonca.gov>

Date Wed 10/15/2025 3:05 PM

To Alison Rondone <arondone@fcs-intl.com>; Cecilia So <cso@fcs-intl.com>

Cc Heidi Duron <hduron@coltonca.gov>; planning@ci.colton.ca.us <planning@coltonca.gov>

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12:00 pm on 10-15-2025

Resident call in – asked general questions, in Spanish, about the proposed GPA/Rezoning project.

Her specific area was near the Fairway Drive changes. Concerns related about the homeless and automobiles traveling too fast in the neighborhood. The City should consider installing traffic calming devices in her neighborhood and along Fairway Drive.

Julietta Fernandez Menchaca.

Mario Suarez, AICP, CNU-A
Planning Manager
909.370.5523 Desk
msuarez@coltonca.gov

Happy October/November 2025!

Development Services Department
Planning Division

659 N. La Cadena Drive, Colton, CA 92324

Office Hours: Mon-Thursday Public Counter Hours 7:30 a.m. to 5:00 p.m.

Standard Office hours Mon-Thursday from 7:00 a.m. to 6:00 p.m.

Website: <https://www.ci.colton.ca.us/782/Planning-Division>

Directory of Phone Numbers and Contact Information:

<https://www.ci.colton.ca.us/directory.aspx?did=21>



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Julietta Fernandez Menchaca (MENCHACA)

Response to MENCHACA-1

The commenter expresses concerns about the proposed project near Fairway Drive and the homeless in this area. This issue is not within the scope of CEQA, which does not consider socioeconomic implications. Therefore, no response is required.

The commenter expresses concerns about automobiles driving too fast near this area, and requests traffic-calming devices along Fairway Drive. This comment pertains to traffic management and roadway safety, which are addressed through the City’s ongoing transportation planning process. While the Draft Program EIR evaluates potential transportation impacts associated with the Program 10/11 Rezone/GPA, the installation of specific traffic-calming devices is outside the scope of this environmental analysis, as the Draft Program EIR does not propose any specific development projects or entitlements. However, future development projects would be evaluated for transportation impacts and would be required to mitigate any impacts to the maximum extent feasible; this mitigation could include traffic-calming features. Additionally, the concerns have been noted by the City and may be considered as part of future roadway safety assessments.

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Phone Call from Bobby Nazier - Property in San Bernardino near Fairview Dr. Zone Change

From Mario Suarez <msuarez@coltonca.gov>

Date Tue 10/14/2025 1:40 PM

To Alison Rondone <arondone@fcs-intl.com>; Cecilia So <cs0@fcs-intl.com>

Cc Heidi Duron <hduron@coltonca.gov>; planning@ci.colton.ca.us <planning@coltonca.gov>

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Bobby Nazier – 310-466-7225

APN: 0141-251-83

Truck Terminal in San Bernardino

Called – concerns with future residential uses along A. Auto Plaza Drive. Request that the City consider appropriate buffers from their use as they are a heavy industrial use as a truck terminal and don't want future residents complaining about their existing use.

Mr. Nazier will be providing a letter for future development concerns requesting the City consider creating specific buffers between any residential uses along Auto Center Drive and the existing truck terminal use in San Bernardino.



Mario Suarez, AICP, CNU-A
Planning Manager
909.370.5523 Desk
msuarez@coltonca.gov

Happy October/November 2025!

Development Services Department
Planning Division
659 N. La Cadena Drive, Colton, CA 92324

Office Hours: Mon-Thursday Public Counter Hours 7:30 a.m. to 5:00 p.m.

Standard Office hours Mon-Thursday from 7:00 a.m. to 6:00 p.m.

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Bobby Nazier (NAZIER)

Response to NAZIER-1

The commenter expresses concerns about future residential uses along South Auto Plaza Drive and requests that the City consider appropriate buffers from their existing heavy industrial use as a truck terminal. The commenter is concerned that future residents may complain about the existing truck terminal operations.

The areas near the truck terminal property include Area 4, Area 4-A, and Area 5. The Draft Program EIR evaluates land use compatibility issues in the Land Use and Planning, Noise, and Air Quality sections. Under CEQA, the primary focus of environmental review is on the potential for a project to result in significant impacts to the existing environment, including impacts to existing sensitive receptors such as current residents, schools, hospitals, and other noise-sensitive land uses. CEQA does not require an analysis of the effects of the existing environment on future residents or users of a project, except in limited circumstances such as when a project would exacerbate existing hazards or conditions (see CEQA Guidelines § 15126.2(a); *California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369).

The Draft Program EIR for the Housing Element Update Program 10/11 Rezone/GPA evaluates potential noise impacts generated by future development on existing sensitive receptors, as required by CEQA. Specifically, the Draft Program EIR discusses the potential for noise, air quality, and operational impacts from adjacent industrial activities, and identifies mitigation measures and planning considerations to minimize incompatibility. The Draft Program EIR provides a program-level analysis. No information is available for analysis regarding potential future specific development projects or entitlements. Any potential future development projects will be evaluated at the project level when they are proposed. It is important to note that the Program 10/11 Rezone/GPA is a policy-level action that identifies sites for potential future residential or mixed-use development but does not approve any specific development projects or site plans. When individual development projects are proposed on these sites, they will be subject to the City's discretionary review process, including design review and compliance with applicable General Plan policies, zoning regulations, and the City's Noise Ordinance. At that time, the City will evaluate the need for site-specific noise attenuation measures such as buffers, setbacks, or other design features to ensure that both existing industrial operations and future residential uses are protected and to ensure that future residents are provided with an acceptable noise environment consistent with City standards and State building codes.

For additional details regarding a program EIR and future development proposals, refer to Master Response 2.

This comment will be included in the public record and provided to City decision-makers for consideration in future planning and entitlement processes.

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Call received from 923 Florence

From Mario Suarez <msuarez@coltonca.gov>

Date Tue 10/14/2025 12:59 PM

To Alison Rondone <arondone@fcs-intl.com>; Cecilia So <cso@fcs-intl.com>

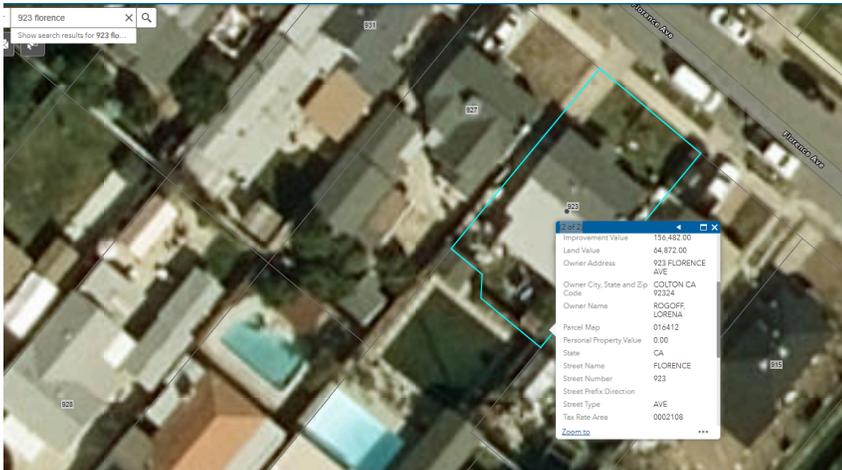
Cc Heidi Duron <hduron@coltonca.gov>

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Hello:

Received a call from Lorena Rogoff on the rezoning. Explained that the rezoning was for property along S. La Cadena Drive south of O Street on east side and west areas of S. La Cadena Drive and other areas, but not along Florence. Florence properties are within the public notice radius only.

FYI



1

Mario Suarez, AICP, CNU-A
Planning Manager
909.370.5523 Desk
msuarez@coltonca.gov

Happy October/November 2025!

Development Services Department
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Lorena Rogoff (ROGOFF)

Response to ROGOFF-1

Please see Master Response 1 regarding questions about specific parcels.

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Outlook

FW: Fairway Drive - Residential Project

From Mario Suarez <msuarez@coltonca.gov>

Date Tue 10/21/2025 10:02 AM

To Cecilia So <cso@fcs-intl.com>; Alison Rondone <arondone@fcs-intl.com>

Cc Heidi Duron <hduron@coltonca.gov>

 1 attachment (2 MB)

Marc Homes - London Meadow Concept Site - MCA 2025-10-04.pdf;

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Mario

From: Jason Viegas <jason.viegas@marchomes.com>

Sent: Wednesday, October 8, 2025 11:49 AM

To: Mario Suarez <msuarez@coltonca.gov>

Cc: jim.powers@marchomes.com

Subject: Re: Fairway Drive - Residential Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Mario,

Please find the attached site plan, dated October 4, 2025, for your records. It illustrates the setbacks from the right-of-way line. | 2

If you have any questions, we'll be happy to jump on a call or meet with you at your convenience.

On Sat, Oct 4, 2025 at 12:30 PM Jason Viegas <jason.viegas@marchomes.com> wrote:

Good afternoon Mario,

It was a pleasure meeting with you on Thursday. | 3

Please let me know if the following summary accurately reflects our discussion, or if any adjustments are needed.

1. One parking space per five dwelling units.
2. One square foot of outdoor recreation space for every five square feet of Gross Floor Area.
3. A tree-per-unit ratio of 1:1, utilizing 50 36-inch box trees.

3
CONT

Regarding the trees, our Landscape Architect suggests the following:

Per our conversation today, since we need to increase the "canopy feel" of the trees, while limited in our planter space; I feel that if we are able to plant larger specimen trees at the outset of the project we can indeed create the desired canopy-effect. Therefore I propose that we plant ALL of the trees at 36" Box size. At a 1 tree per unit ratio that is 50- 36" Box trees. Hopefully this is an acceptable compromise to the city, and their requirement for denser vegetation.

4

I look forward to hearing your thoughts on this.

Thank you and enjoy your weekend.

On Thu, Oct 2, 2025 at 2:21 PM Mario Suarez <msuarez@coltonca.gov> wrote:

Hi:

I'm available until 5:00 pm today.

Mario

From: Jason Viegas <jason.viegas@marchomes.com>
Sent: Thursday, October 2, 2025 11:04 AM
To: Mario Suarez <msuarez@coltonca.gov>
Cc: jim.powers@marchomes.com
Subject: Re: Fairway Drive - Residential Project

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Good Morning Mario,

I hope you had a wonderful trip. We have reviewed the code amendment and made changes to the site plan accordingly.

We would like to stop by your office today around 12:00 PM to show you the updated plan. Would that work for you?

On Fri, Sep 26, 2025 at 4:53 PM Jason Viegas <jason.viegas@marchomes.com> wrote:

Hi Mario,

I hope you had a safe trip to Monterey .

I just spoke with both the Architect and Landscape Architects. They're reviewing your attachments this weekend . I will get back to you very shortly .

Thanks!

Sent from my iPhone

On Sep 26, 2025, at 1:13 PM, Mario Suarez <msuarez@coltonca.gov> wrote:

Hello:

We are moving forward with the following – please review.

Mario

From: Mario Suarez
Sent: Wednesday, September 24, 2025 2:24 PM
To: 'Jason Viegas' <jason.viegas@marchomes.com>
Cc: jim.powers@marchomes.com
Subject: RE: Fairway Drive - Residential Project

Please review the proposed code amendment

From: Jason Viegas <jason.viegas@marchomes.com>
Sent: Wednesday, July 30, 2025 1:00 PM
To: Mario Suarez <msuarez@coltonca.gov>
Cc: jim.powers@marchomes.com
Subject: Re: Fairway Drive - Residential Project

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Hi Mario,

We have some large printed copies that we'd like to show you in person to get your input. It should only take a few minutes.

Would it be possible for us to stop by at 3:00 PM today?

On Wed, Jul 30, 2025 at 12:26 PM Mario Suarez <msuarez@coltonca.gov> wrote:

Yes, send an appointment request via Microsoft teams or I can send you one.

Thank you,

Mario

From: Jason Viegas <jason.viegas@marchomes.com>
Sent: Wednesday, July 30, 2025 12:22 PM
To: Mario Suarez <msuarez@coltonca.gov>
Cc: jim.powers@marchomes.com
Subject: Re: Fairway Drive - Residential Project

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Good afternoon Mario,

We would like to stop by your office to discuss the Fairway project. Would you be available at 3 PM for a quick over-the-counter discussion?

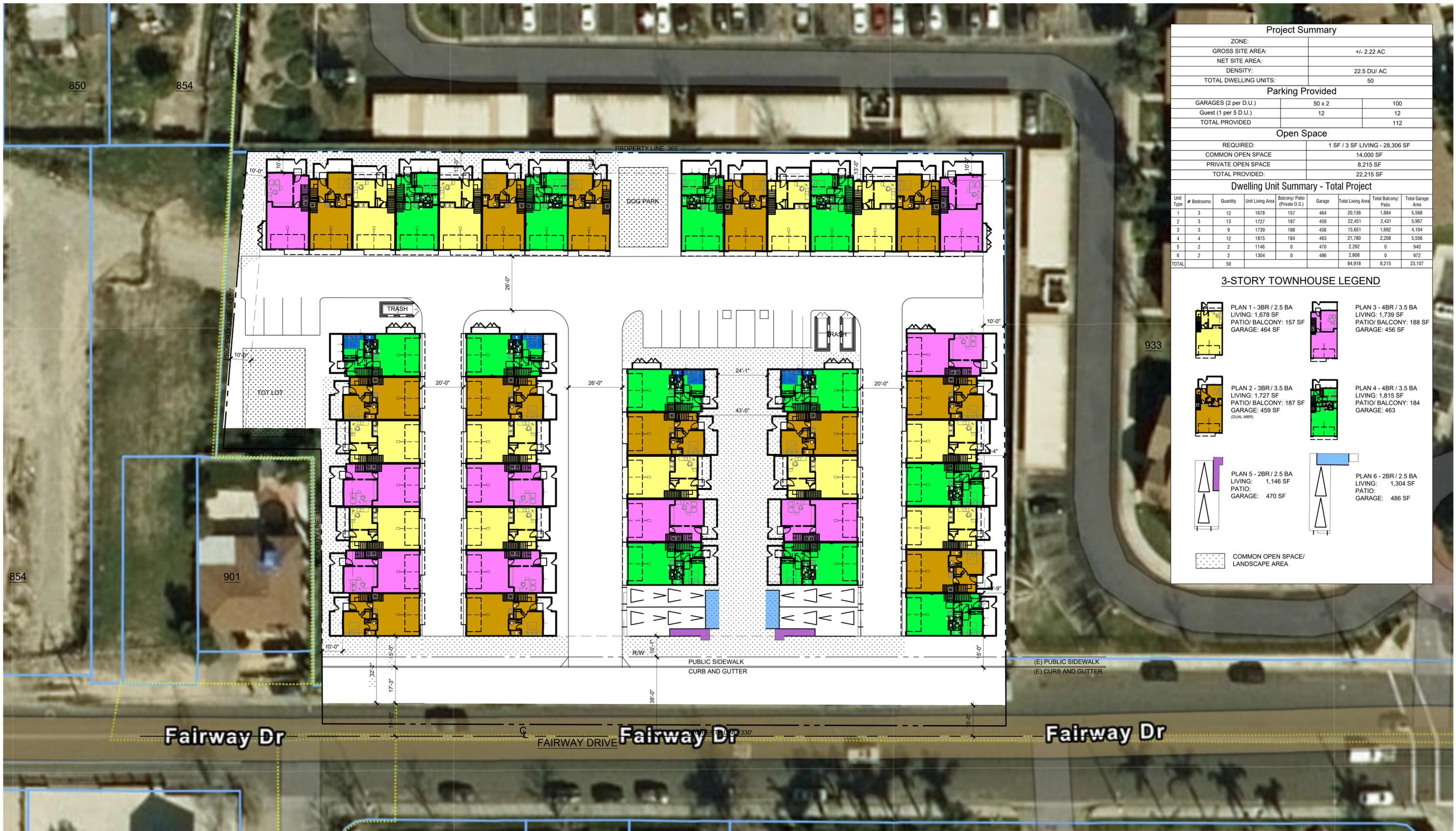
Hope all is well .

On Wed, Nov 13, 2024 at 5:02 PM Mario Suarez <msuarez@coltonca.gov> wrote:

Respectfully yours,

Jason Marc Viegas
President at Marc Homes
www.marchomes.com
M: 562 500 6691

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Project Summary								
ZONE:								
GROSS SITE AREA:	+/- 2.22 AC							
NET SITE AREA:								
DENSITY:	22.5 DU/ AC							
TOTAL DWELLING UNITS:	50							
Parking Provided								
GARAGES (2 per D.U.):	50 x 2	100						
Guest (1 per 5 D.U.):	12	12						
TOTAL PROVIDED:	112							
Open Space								
REQUIRED:	1 SF / 3 SF LIVING - 28,306 SF							
COMMON OPEN SPACE:	14,000 SF							
PRIVATE OPEN SPACE:	8,215 SF							
TOTAL PROVIDED:	22,215 SF							
Dwelling Unit Summary - Total Project								
Unit Type	# Bedrooms	Quantity	Unit Living Area	Balcony/ Patio (Private O.S.)	Garage	Total Living Area	Total Balcony/ Patio	Total Garage Area
1	3	12	1678	157	464	20,136	1,884	5,568
2	3	13	1727	187	459	22,451	2,431	5,967
3	3	9	1739	188	456	15,651	1,692	4,104
4	4	12	1815	184	463	21,780	2,208	5,556
5	2	2	1146	0	470	2,292	0	940
6	2	2	1304	0	486	2,608	0	972
TOTAL		50				84,918	8,215	23,107

3-STORY TOWNHOUSE LEGEND

 <p>PLAN 1 - 3BR / 2.5 BA LIVING: 1,678 SF PATIO/ BALCONY: 157 SF GARAGE: 464 SF</p>	 <p>PLAN 3 - 4BR / 3.5 BA LIVING: 1,739 SF PATIO/ BALCONY: 188 SF GARAGE: 456 SF</p>
 <p>PLAN 2 - 3BR / 3.5 BA LIVING: 1,727 SF PATIO/ BALCONY: 187 SF GARAGE: 459 SF (DUAL MBR)</p>	 <p>PLAN 4 - 4BR / 3.5 BA LIVING: 1,815 SF PATIO/ BALCONY: 184 GARAGE: 463</p>
 <p>PLAN 5 - 2BR / 2.5 BA LIVING: 1,146 SF PATIO: GARAGE: 470 SF</p>	 <p>PLAN 6 - 2BR / 2.5 BA LIVING: 1,304 SF PATIO: GARAGE: 486 SF</p>
 <p>COMMON OPEN SPACE/ LANDSCAPE AREA</p>	

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Jason Viegas (VIEGAS)

Response to VIEGAS-1

The commenter stated that 0.25 guest parking spaces would work for the project instead of 0.20. This comment is noted. This comment does not raise any environmental concerns related to the Draft Program EIR, and no further response is required.

Response to VIEGAS-2

This comment is related to setbacks. This comment is noted. This comment does not raise any environmental concerns related to the Draft Program EIR, and no further response is required.

Response to VIEGAS-3

This comment pertains to specifications for a development project. This comment is noted. This comment does not raise any environmental concerns related to the Draft Program EIR, and no further response is required.

Response to VIEGAS-4

This comment pertains to landscaping specifications. This comment is noted. This comment does not raise any environmental concerns related to the Draft Program EIR, and no further response is required.

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