

# Mission Grove Apartments Project

Final Environmental Impact Report SCH#2022100610

**Appendix K: Mission Grove Neighborhood Alliance Comment Letters** 



From: A R <cetalicia@gmail.com>
Sent: Sunday, June 23, 2024 8:19 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.3.5

The proposed Project includes a total of 347 studio, one-, two-, and three-bedroom residential apartment units within five, 4-story buildings. The proposed Project is anticipated to house approximately 829 tenants. 56% -1 bdrm or less, 41%- 2 bdrm, 3%- 3 bdrm

- This mix of unit sizes is not supported by market data. This is based on data long before Covid at it assumes people want to live in a shopping center and occupy a majority of 1 bedrooms.
- Can you provide updated market data, including post-COVID trends, that supports the proposed mix of unit sizes (56% one-bedroom or less, 41% two-bedroom, and 3% three-bedroom) for the residential apartment units?
- How did you determine the demand for one-bedroom units in a shopping center environment, and what evidence do you have that this demand remains strong in the current market?
- Have you conducted any recent surveys or studies to understand the preferences of potential tenants regarding living in a mixed-use development within a shopping center, and if so, what were the findings?
- What contingency plans do you have in place if the demand for one-bedroom units does not meet expectations, and how will you adapt the project to address potential vacancies?
- Can you provide examples of similar mixed-use developments where a high percentage of one-bedroom units have been successful, and what lessons from those projects are being applied to ensure the success of this proposed project?

## Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Alicia Ramirez 166 Acacia Glen Dr Mission Grove Neighborhood Alliance From: Andrew Huben <a.huben@icloud.com>

**Sent:** Sunday, June 23, 2024 8:05 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR: Section 6.3.2

Commitment of Future Generations - Approval of the Project would result in environmental changes or impacts that commit future generations to new environmental circumstances. Primarily, the approval of the Project would change the underlying GP 2025 land use designations and zoning of the Project site and the Mission Grove Specific Plan land use and zoning, as detailed in Section 5.11, Land Use and Planning. The change in the underlying regulations would allow for a change from C - Commercial to MU-U - Mixed Use-Urban for a multi-family development. This would result, in turn, in an increase in population as compared to commercial development as envisioned in the City's GP 2025.

- This project would have a lasting effect on the local area for generations. It would also set a precedent that all the regulations can be waived or overwritten if the local government wants a project that does not meet the current criteria and the people affected the most by the project will struggle to be heard.
- Can you provide a detailed analysis of how the proposed change from C Commercial to MU-U Mixed Use-Urban will impact the long-term land use and zoning consistency within the Mission Grove Specific Plan and the broader GP 2025 framework?
- What specific measures will be taken to ensure that the voices and concerns of the local community, who are most affected by the project, are adequately heard and addressed throughout the planning and approval process?
- How do you plan to mitigate the potential negative impacts of increased population density on local infrastructure, public services, and community resources, given the shift from commercial to multi-family residential development?
- Can you provide examples of similar projects where changes in land use designations and zoning have been successfully implemented without setting a negative precedent for future developments, and what lessons from those projects will be applied here?
- What long-term monitoring and evaluation strategies will be put in place to assess the environmental and social impacts of the project on future generations, and how will these findings be used to inform future land use and zoning decisions?

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Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance

Andrew Huben

**From:** annette myers <myersat@sbcglobal.net>

**Sent:** Sunday, June 23, 2024 8:33 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

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Section 5.9.6

The Project's proposed General Plan designation and zoning of Mixed Use-Urban, is consistent with surrounding development, and would assist in transitioning between commercial and single-family residential uses.

- This statement is misleading. It implies the project as presented is OK, even though it does not meet the ALUC requirements. It is not consistent with surrounding developments. This is another example of the EIR being used as a marketing tool for the project.
- Can you provide specific data or examples that demonstrate how the proposed Mixed Use-Urban designation is consistent with the surrounding development, given that it appears to significantly exceed both ALUC requirements and existing density levels in the area?
- How do you justify the claim that this project would assist in transitioning between commercial and single-family residential uses, considering the substantial difference in density and scale compared to existing neighborhoods?
- What specific measures or design elements are incorporated into the project to ensure a smooth transition between the proposed high-density development and the surrounding lower-density areas?
- Given that the project does not meet ALUC requirements, how do you plan to address potential safety and compatibility concerns related to its proximity to March Air Reserve Base?
- Can you provide a detailed comparison of the proposed project's density, height, and overall scale with those of the surrounding developments to substantiate the claim of consistency?

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Thank you for your consideration of this letter.

Sincerely, Annette Myers 19144 White Dove Lane 92508 Mission Grove Neighborhood Alliance

**From:** annette myers <myersat@sbcglobal.net>

**Sent:** Sunday, June 23, 2024 8:33 AM

To: Hernandez, Veronica

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Section 6.2

ALUC: Project would result in a significant and unavoidable impact. Although implementation of the recommended conditions identified in the Riverside County Airport Land Use Commission (ALUC) Staff Report for the Project would not render the Project consistent with the MARB/IPA LUCP Compatibility Zone C2 density compatibility criteria, they would be implemented, in order to reduce the potential hazards from flight accidents to the greatest extent feasible.

- Rejected by ALUC for residential density issues.
- Given that the ALUC has rejected the project due to residential density issues and determined it would result in a significant and unavoidable impact, what specific justifications can you provide for proceeding with the project as proposed?
- Can you provide a detailed analysis of how the recommended conditions from the ALUC Staff Report would mitigate potential hazards, despite not fully resolving the density compatibility issues?
- Have you explored any alternative designs or configurations that would bring the project into compliance with the MARB/IPA LUCP Compatibility Zone C2 density criteria, and if so, why were these alternatives not pursued?
- What specific measures beyond the ALUC's recommended conditions do you propose to further reduce potential flight accident hazards and address safety concerns?
- How do you plan to address potential legal and liability issues that may arise from developing a project that has been deemed inconsistent with airport land use compatibility criteria by the responsible agency?

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Thank you for your consideration of this letter.

Sincerely,
Annette Myers
19144 White Dove Lane
92508
Mission Grove Neighborhood Alliance

**From:** annette myers <myersat@sbcglobal.net>

**Sent:** Sunday, June 23, 2024 8:31 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

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More specifically, I would like to comment on the following sections related to the EIR: Section 5.1.1

Aesthetics-Setting: Although the majority of the City is urbanized

- This is not true and no evidence has been provided to support this statement.
- Can you provide specific data or studies that support the claim that the majority of the City is urbanized? What metrics or criteria were used to make this determination?
- How do you define "urbanized" in the context of this project, and what percentage of the City meets this definition according to your analysis?
- Have you conducted a comprehensive land use survey of the City to verify the extent of urbanization? If so, can you share the methodology and results?
- How does the level of urbanization in the immediate project area compare to other parts of the City, and how might this impact the project's compatibility with its surroundings?
- Given that the statement about urbanization has been challenged, how does this affect your overall assessment of the project's aesthetic impacts, particularly in terms of its compatibility with the existing visual character of the area?

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Mission Grove Neighborhood Alliance

**From:** annette myers <myersat@sbcglobal.net>

**Sent:** Sunday, June 23, 2024 8:30 AM

To: Hernandez, Veronica

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More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.5

Alternative 3, the Retail Development Alternative, would consist of retaining the existing retail building and associated surface parking lot with only minor improvements to the inside and/or exterior of the building and/or associated surface parking lot and landscaping. The existing building would house a permanent retail tenant utilizing the full square footage of the building for retail.

- Have you conducted a comprehensive market analysis to determine the viability of attracting a large-scale retail tenant for the entire building, and if so, what were the key findings?
- How does the potential economic impact of retaining the site as retail compare to your proposed residential development regarding job creation, local tax revenue, and overall community benefit?
- If selling the property to a retailer is considered, what criteria would you use to ensure the new owner's plans align with the city's long-term development goals and the needs of the surrounding community?
- Have you explored any mixed-use alternatives that could incorporate retail and residential components, potentially preserving some of the existing structure while addressing housing needs?
- Given the trend of repurposing retail spaces for alternative uses, as mentioned in the search results, what innovative approaches have you considered for this site beyond traditional retail or residential development?

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Sincerely, Annette Myers 19144 White Dove Lane 92508 Mission Grove Neighborhood Alliance

**From:** annette myers <myersat@sbcglobal.net>

**Sent:** Sunday, June 23, 2024 8:29 AM

To: Hernandez, Veronica

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Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units.

- The ALUC will allow higher density than 6 du/ac. The surrounding area shows densities as high as 16 du/ac. A 16du/ac with retail on the bottom floor would be more compatible with the area. Especially if the unit mix concentrated on 2 and 3 bedroom.
- Given that the surrounding area shows densities up to 16 dwelling units per acre, why have you chosen a significantly lower density of 58 units for Alternative 2, rather than exploring a middle ground that could better align with the neighborhood character?
- Have you conducted any studies to determine how a mixed-use development with retail on the ground floor and residential units above (at 16 du/ac) would impact local economic vitality and housing affordability compared to your current proposal?
- Can you provide a comparative analysis of the environmental impacts, particularly regarding traffic and infrastructure demands, between your proposed 347-unit development and a potential 16 du/ac mixed-use alternative?
- How would focusing on two and 3-bedroom units in a higher-density scenario affect the project's ability to meet local housing needs, especially for families, compared to your current unit mix?
- Considering that the Airport Land Use Commission (ALUC) allows for higher density than six du/ac, what factors led to the decision to propose such a low-density alternative, and how does this align with broader city planning goals for efficient land use and housing provision?

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Sincerely,

Annette Myers 19144 White Dove Lane 92508 Mission Grove Neighborhood Alliance

**From:** annette myers <myersat@sbcglobal.net>

**Sent:** Sunday, June 23, 2024 8:27 AM

To: Hernandez, Veronica

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Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

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Sincerely,

Annette Myers 19144 White Dove Lane Mission Grove Neighborhood Alliance

**From:** annette myers <myersat@sbcglobal.net>

**Sent:** Sunday, June 23, 2024 8:35 AM

To: Hernandez, Veronica

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 6.1

Several multi-family residential uses are located in Zone C2, near the Project site. There is a condominium complex, Mission Villas, located at 200 E. Alessandro Boulevard, adjacent to the Project site, across from Alessandro Boulevard. The Mission Grove Park apartments, located at 7450 Northrop Drive, are located closer to the end of Runway 14-32 than the Project. Mission Grove Park consists of 432 units and has a density of 16 dwelling units per acre. Estancia, located at 7871 Mission Grove Parkway South, consists of 208 units and has a density of 1.3 du/ac. The Project is consistent with other multi-family residential developments in the C2 Zone. Additionally, the Project consist of infill development of a commercial site. The vast majority of Zone C2 in the City of Riverside has been built out, largely by single family residences. Few infill sites, such as the Project are available for development. As such, the Project would not encourage other developments to exceed Zone C2 density standards or encroach upon MARB/IPA operations.

- There is no market data presented that the area has a demand for more apartments and the project would encourage and set a precedent for more high density projects in a low to medium density suburban area.
- Can you provide market data or studies that demonstrate a demand for more highdensity apartments in the area, and how this demand justifies the proposed project's density?
- How does the proposed project's density compare to the existing multi-family residential developments mentioned (Mission Villas, Mission Grove Park, and Estancia), and what specific factors make this higher density appropriate for the site?
- What measures will be taken to ensure that the proposed project does not set a precedent for future high-density developments that could alter the character of the low to medium density suburban area?
- How do you plan to address potential concerns from the community and local stakeholders about the impact of increased density on infrastructure, traffic, and public services?
- Can you provide a detailed analysis of how the proposed project will integrate with the existing residential and commercial uses in Zone C2, and what specific benefits it will bring to the community?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Annette Myers 19144 White Dove Lane 92508 Mission Grove Neighborhood Alliance

From: Arnold Allende <allendefamily90@yahoo.com>

**Sent:** Sunday, June 23, 2024 10:03 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.4

- Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. Increase the type and amount of housing available consistent with the goals of the City's Housing Element.
- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
- This is not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likely hood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood.
- Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for high-density urban apartments in a suburban neighborhood like Mission Grove?
- How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services?
- What measures will be taken to ensure that the proposed mixed-use development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation?
- Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development?
- How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Arnold Allende Sr. 6802 Mission Grove Parkway N Riverside, CA. 92506

Mission Grove Neighborhood Alliance

From: Arnold Allende <allendefamily90@yahoo.com>

**Sent:** Sunday, June 23, 2024 10:01 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.5

Alternative 3, the Retail Development Alternative, would consist of retaining the existing retail building and associated surface parking lot with only minor improvements to the inside and/or exterior of the building and/or associated surface parking lot and landscaping. The existing building would house a permanent retail tenant utilizing the full square footage of the building for retail.

- Have you conducted a comprehensive market analysis to determine the viability of attracting a large-scale retail tenant for the entire building, and if so, what were the key findings?
- How does the potential economic impact of retaining the site as retail compare to your proposed residential development regarding job creation, local tax revenue, and overall community benefit?
- If selling the property to a retailer is considered, what criteria would you use to ensure the new owner's plans align with the city's long-term development goals and the needs of the surrounding community?
- Have you explored any mixed-use alternatives that could incorporate retail and residential components, potentially preserving some of the existing structure while addressing housing needs?
- Given the trend of repurposing retail spaces for alternative uses, as mentioned in the search results, what innovative approaches have you considered for this site beyond traditional retail or residential development?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Nancy Allende 902 Cannon Road Riverside, CA. 92506

Mission Grove Neighborhood Alliance

From: Arnold Allende <allendefamily90@yahoo.com>

**Sent:** Sunday, June 23, 2024 9:59 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Arnold Allende 902 Cannon Road Riverside. CA. 92506 (951) 809-7327 Mission Grove Neighborhood Alliance

From: Arnold Allende <allendefamily90@yahoo.com>

**Sent:** Sunday, June 23, 2024 10:05 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

**Section 5.17.5** 

Environmental Impacts - Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?The City's guidelines provide guidance regarding VMT analysis based on land use types.10. Implement Subsidized or Discounted Transit Program (TRT-4).In conclusion, while the previously discussed TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent, these measures would not reduce the Project-generated VMT impact to a less than significant level.

- The VMT impact cannot be mitigated.
- Given that the proposed TDM measures are insufficient to reduce the Projectgenerated VMT impact to a less than significant level, what additional innovative strategies or technologies have you considered to further mitigate VMT impacts?
- Can you provide a detailed analysis of how the 17.7 percent reduction in VMT was calculated, and what specific assumptions were made in this calculation?
- Have you explored partnerships with local transit agencies or ride-sharing companies to develop more robust transit solutions that could potentially reduce VMT beyond the current projections?
- What specific measures will be implemented to monitor and evaluate the effectiveness of the proposed TDM strategies over time, and how will these findings be used to adjust and improve VMT reduction efforts?
- Given that the VMT impact cannot be fully mitigated, how do you plan to address potential community concerns about increased traffic congestion and related environmental impacts, particularly in the context of the project's consistency with local and regional transportation plans?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Rosa Allende 6802 Mission Grove Parkway N Riverside, CA. 92506 Mission Grove Neighborhood Alliance Sent from my iPhone **From:** barbararvrsd <barbararvrsd@aol.com>

**Sent:** Sunday, June 23, 2024 7:54 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Barbara Christie 6848 Rycroft Dr.

## Riverside CA 92506

# Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: barbararvrsd <barbararvrsd@aol.com>
Sent: Monday, June 24, 2024 11:12 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.16.4

Project Design- Parks -The Zoning Code requires 150 square feet of common usable open space per unit for projects in the Mixed-Use – Urban Zone, for a total of 52,050 square feet of required open space. The applicant is proposing a Specific Plan Amendment to require 75 square feet of common usable open space per unit for the Mixed-Use – Urban designation, for a total of 26,025 square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres.

- Another concession, modify the Park size requirement in the Specific Plan to a much lower level from 52,050 SF down to 26,025 SF so the project qualifies. Where is all that support for high density residential housing when all the requirements must be changed. These requirements are there for a reason.
- Can you provide a detailed justification for reducing the common usable open space requirement from 150 square feet per unit to 75 square feet per unit, and explain how this reduction aligns with the overall goals of promoting high-density residential housing while maintaining quality of life for residents?
- What specific studies or data have you used to determine that 75 square feet of common usable open space per unit is sufficient for the well-being and recreational needs of the residents in this high-density development?
- How do you plan to mitigate the potential negative impacts of reducing the open space requirement by nearly 50%, particularly in terms of resident health, community interaction, and overall livability of the development?
- Can you provide examples of similar high-density residential projects where reduced open space requirements have been successfully implemented without compromising the quality of life for residents?
- Given that these requirements are in place for specific reasons, what additional amenities or design features do you propose to compensate for the significant reduction in common usable open space, and how will these ensure that the project still meets the intent of the original requirements?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Barbara Christie 6848 Rycroft Dr. Riverside CA 92506

Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: Bill Clark <pop92517@gmail.com>
Sent: Sunday, June 23, 2024 8:30 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Alternative Uses - Section 7.0 The following discussion considers alternatives to implementing the Project and examines the potential environmental impacts resulting from each alternative. By comparing these alternatives to the Project, the relative advantage(s) can be weighed and analyzed. • These alternatives are not based on any feasibility study, local market analysis, or other independent studies to support the statements or conclusions. Studies have shown that only a tiny percentage of old KMARTS are demolished and replaced with residential housing. • Can you provide specific feasibility studies or local market analyses supporting the viability of converting this KMART site into residential housing? • What percentage of similar KMART conversions to residential housing have been successful in comparable markets, and how does this inform your project's potential success? • Have you conducted any environmental impact assessments to compare the effects of demolition and new construction versus adaptive reuse of the existing KMART structure? • Given that studies show only a tiny percentage of

old KMARTs are demolished for residential use, what unique factors make this site suitable for such a conversion? • How does your proposed residential development align with the local community's long-term urban planning goals and housing needs, and can you provide data to support this alignment? • Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance

Bill Clark 541 Atwood Ct, Riverside, CA 92506 From: Bill Clark <pop92517@gmail.com>
Sent: Sunday, June 23, 2024 8:31 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 1.3 The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking. • This is an unsupported statement that makes unsupported assumptions. This is a proposed apartment building that will replace a large portion of a commercial facility that was designed to support the neighborhood. There is no market data to support this project. • Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change? • How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential? • Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed for car-dependent retail? • What specific shared elements, including parking, are planned between the residential and retail components, and how will these be implemented without negatively impacting the existing retail operations? • Given that the project will replace a portion of a commercial facility designed to support the neighborhood, how do you plan to mitigate the potential loss of retail services and ensure that the new development still meets the community's needs? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance

Bill Clark 541 Atwood Ct, Riverside, CA 92506 From: Chris And Brandi <chris.brandi.marsh@gmail.com>

**Sent:** Monday, June 24, 2024 10:50 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

#### Dear Ms. Hernandez:

In addition to comments and questions below re: this project, is there communication with the March JPA? My neighborhood has declined significantly in the past 7 years with the amount of multi family rentals with extremely high rent, as well as planned warehouses that will not likely be employing anyone from our neighborhoods. Apartments are the exact same thing. They bring instability to the neighborhood and the rent is outrageous so people cannot afford to take care of their surroundings. There is more trash on neighborhood streets surrounding the area for the planned KMart development and traffic and people parking on the surrounding streets. Im not sure what is bringing people to the neighborhood- but we've had two incidences where we've had to call non emergency for individuals obviously on drugs or mentally unstable who wader into our neighborhood and don't live here. I no longer feel safe letting my preteen and teen children explore surrounding areas as I did in my youth due to the types of people that are somehow finding their ways into the neighborhood. Riverside is already struggling with controlling crime - the youth breaking into Taft being a prime example. It's time to stop crowding our neighborhoods that are established. Riverside has the opportunity to develop and support restaurants and shops owned and managed by local citizens instead of large chains. We could employ our own teens and young adults, but instead we bring in chains and planned warehouses and apartment complexes. We have enough housing. Let's focus on getting Riversiders jobs within our own city instead of them having to commute elsewhere for decent pay. Where is our vision for our community?

Respectfully,

Brandi Marsh

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

### **Section 5.17.5**

Environmental Impacts - Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? The City's guidelines provide guidance regarding VMT analysis based on land use types. 10. Implement Subsidized or Discounted Transit Program (TRT-4). In conclusion, while the previously discussed TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent, these measures would not reduce the Project-generated VMT impact to a less than significant level.

- The VMT impact cannot be mitigated.
- Given that the proposed TDM measures are insufficient to reduce the Projectgenerated VMT impact to a less than significant level, what additional innovative strategies or technologies have you considered to further mitigate VMT impacts?
- Can you provide a detailed analysis of how the 17.7 percent reduction in VMT was calculated, and what specific assumptions were made in this calculation?
- Have you explored partnerships with local transit agencies or ride-sharing companies to develop more robust transit solutions that could potentially reduce VMT beyond the current projections?

- What specific measures will be implemented to monitor and evaluate the effectiveness of the proposed TDM strategies over time, and how will these findings be used to adjust and improve VMT reduction efforts?
- Given that the VMT impact cannot be fully mitigated, how do you plan to address potential community concerns about increased traffic congestion and related environmental impacts, particularly in the context of the project's consistency with local and regional transportation plans?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance

Sent from my iPhone

From: Brian Kerr <bri>Sent: Brian Kerr <bri>Monday, June 24, 2024 1:23 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 3.00

- General Plan Amendment (GPA) to change the General Plan Land Use Designation from C Commercial to MU-U Mixed Use-Urban, to allow residential land use. Zoning Code Amendment (RZ) to change the zoning from CR-SP Commercial Retail and Specific Plan (Mission Grove) Overlay Zones to MU-U-SP Mixed Use-Urban and Specific Plan (Mission Grove) Overlay Zones. Specific Plan Amendment (SPA) to revise the Mission Grove Specific Plan. Tentative Parcel Map (TPM) 38598 to subdivide the existing Parcel 1 of Parcel Map 26320 into two parcels for financing and conveyance purposes. Design Review (DR) for the proposed site design and building elevations. Environmental Impact Report (EIR) for the preparation of an Environmental Impact Report for the proposed Project. Airport Land Use Commission (ALUC) determination of consistency or inconsistency with applicable airport land use compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP).
  - 1. What specific residential uses are being proposed within the Mixed Use-Urban (MU-U) designation, and how many residential units are planned?
  - 2. How will the proposed zoning change impact existing commercial businesses in the area, and what provisions are being made to support these businesses during the transition?
  - 3. Can you provide details on how the revised Mission Grove Specific Plan will address traffic and transportation impacts, especially considering the increase in residential density?
  - 4. How does the Tentative Parcel Map (TPM) 38598 subdivision affect the overall development plan, and what are the intended uses for each of the newly created parcels?
  - 5. What are the primary design elements being proposed in the Design Review (DR) for the site design and building elevations, and how do they align with the community's architectural standards?
  - 6. What are the key environmental impacts identified in the Environmental Impact Report (EIR), and what mitigation measures are proposed to address these impacts?
  - 7. How will the proposed project ensure consistency with the airport land use compatibility criteria set by the Airport Land Use Commission (ALUC)?

- 8. What community outreach and engagement efforts have been undertaken to gather input and feedback from local residents and stakeholders about the proposed changes?
- 9. How does the proposed Mixed Use-Urban (MU-U) designation align with the city's long-term growth and development goals as outlined in the General Plan? 10. Are there any anticipated challenges or obstacles in obtaining the necessary approvals and amendments from the various planning and zoning authorities, and how does the developer plan to address them?

#### Section 3.2

The current land use of the project site is a vacant retail site. The General Plan designation for the project site is C - Commercial and it is currently zoned as CR-SP - Commercial Retail and Specific Plan (Mission Grove) Overlay Zones. The site is designated as Retail Business & Office within the Mission Grove Specific Plan.

- 1. What is the history and previous use of the vacant retail site, and why has it remained vacant up to this point?
- 2. What market research or demand analysis has been conducted to support the transition from a Commercial to a Mixed Use-Urban designation?
- 3. How does the proposed Mixed Use-Urban development plan to integrate with the surrounding commercial and residential areas?
- 4. What types of businesses or retail opportunities are being planned within the new Mixed Use-Urban development?
- 5. How will the proposed changes impact property values in the surrounding area?
- 6. What considerations have been made regarding the potential increase in population density and its effects on local infrastructure and public services?
- 7. What is the timeline for the development project from approval to completion, and what are the key milestones?
- 8. How will the project address potential concerns from local businesses currently operating under the Commercial Retail designation?
- 9. Are there any potential environmental hazards or concerns associated with the current vacant retail site, and how will they be mitigated?
- 10. What specific benefits does the developer anticipate the new Mixed Use-Urban designation will bring to the community compared to the existing Commercial designation?

#### Section 3.2.2

The project includes a General Plan Amendment to change the General Plan Land Use Designation from C – Commercial to MU-U – Mixed-Use – Urban, to allow the residential land use. A Zone Change is also proposed from CR – Commercial Retail – to

MU-U – Mixed-use Urban. Mixed Use-Urban zoning has been selected for this site to bring together medium- to high-density residential and retail development in a mixed use environment. The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking. The existing and proposed General Plan Land Use Designations and zoning are shown in Figure 3.0-4 General Plan Land Use Map and Figure 3.0-5 Zoning, respectively

- 1. How many residential units are planned in the proposed apartment project, and what types of units (e.g., studio, one-bedroom, two-bedroom) will be included?
- 2. What specific amenities and features are planned to enhance pedestrian connectivity and walkability within the Mixed Use-Urban zone?
- 3. How will shared parking be managed to ensure adequate availability for both residential and retail users?
- 4. What strategies will be implemented to mitigate potential conflicts between residential and retail activities within the mixed-use environment?
- 5. Can you provide examples of similar successful mixed-use developments that have influenced the design and planning of this project?
- 6. What considerations have been made to ensure the project is sustainable and environmentally friendly?
- 7. How will the project address potential concerns related to noise, traffic, and safety for both residents and retail customers?
- 8. What measures are being taken to ensure affordable housing options are included in the proposed apartment project?
- 9. How does the proposed project align with regional housing and economic development goals?
- 10. What feedback have you received from the community and stakeholders regarding the General Plan Amendment and Zone Change, and how has it been incorporated into the project design?

## Section 3.2.3

The site is bordered on the north, west, and east (across Mission Grove Parkway) by the Mission Grove Plaza Shopping Center, which has a General Plan Land Use Designation of C - Commercial and is zoned CR-SP - Commercial Retail and Specific Plan (Mission Grove) Overlay Zones, and is developed with retail uses. Multi-family residences are located further north (across Alessandro Boulevard), which have a General Plan Land Use Designation of HDR – High-Density Residential, and are zoned R-3-3000-SP – Multi-Family Residential and Specific Plan (Mission Grove) Overlay Zones. The project site is bordered on the south by a single-family residential

neighborhood (across Mission Village Drive), which has a General Plan Land Use Designation of Medium High Density Residential (MHDR) and is zoned R-1-7000-SP – Single-Family Residential and Specific Plan (Mission Grove) Overlay Zones.

- 1. How will the proposed mixed-use development impact traffic patterns on Mission Grove Parkway, Alessandro Boulevard, and Mission Village Drive?
- 2. What measures will be taken to ensure that the transition from commercial to mixed-use zoning does not negatively affect the adjacent Mission Grove Plaza Shopping Center?
- 3. How will the proposed development be designed to maintain compatibility with the existing single-family residential neighborhood to the south?
- 4. What plans are in place to address potential concerns from residents of the multi-family residences to the north regarding increased density and activity?
- 5. How will the project incorporate green spaces or recreational areas to serve both the new residential units and the existing community?
- 6. What are the projected economic impacts of the new development on the Mission Grove Plaza Shopping Center and surrounding commercial areas?
- 7. How will the project address concerns related to noise and light pollution for the surrounding residential areas?
- 8. What infrastructure improvements are planned to support the increased demand from the new mixed-use development, such as water, sewer, and electrical systems?
- 9. How will the project promote a sense of community and connectivity between the new development and the existing residential and commercial areas? 10. What considerations have been made regarding emergency services access and public safety for the proposed development and its integration with the surrounding areas?

#### Section 3.3.1

The proposed Project includes a General Plan Amendment (GPA) to change the existing General Plan Land Use Designation of the project site from C - Commercial to MU-U - Mixed Use-Urban, to allow residential land use.

- 1. What is the rationale behind changing the General Plan Land Use Designation from Commercial to Mixed Use-Urban for this project site?
- 2. How does the proposed General Plan Amendment align with the long-term vision and goals of the city's General Plan?
- 3. What specific benefits will the Mixed Use-Urban designation bring to the community compared to the current Commercial designation?
- 4. How will the proposed amendment impact the availability and variety of commercial services currently provided in the area?

- 5. What types of residential uses (e.g., rental apartments, condominiums, affordable housing) are planned under the Mixed Use-Urban designation?
- 6. How will the proposed change affect the local economy, particularly in terms of job creation and business development?
- 7. What steps will be taken to ensure a smooth transition for existing businesses and landowners affected by the General Plan Amendment?
- 8. How will the proposed Mixed Use-Urban development address potential issues related to increased traffic and parking demand?
- 9. What community outreach has been conducted to gauge public opinion on the proposed General Plan Amendment, and what feedback has been received? 10. Are there any potential environmental impacts associated with the General Plan Amendment, and how will they be mitigated?

#### Section 3.2.2

The site is bordered on the north, west, and east (across Mission Grove Parkway) by the Mission Grove Plaza Shopping Center, which has a General Plan Land Use Designation of C - Commercial and is zoned CR-SP - Commercial Retail and Specific Plan (Mission Grove) Overlay Zones, and is developed with retail uses. Multi-family residences are located further north (across Alessandro Boulevard), which have a General Plan Land Use Designation of HDR – High-Density Residential, and are zoned R-3-3000-SP – Multi-Family Residential and Specific Plan (Mission Grove) Overlay Zones. The project site is bordered on the south by a single-family residential neighborhood (across Mission Village Drive), which has a General Plan Land Use Designation of Medium High Density Residential (MHDR) and is zoned R-1-7000-SP – Single-Family Residential and Specific Plan (Mission Grove) Overlay Zones.

- 1. How will the proposed mixed-use development ensure compatibility with the Mission Grove Plaza Shopping Center's commercial uses?
- 2. What measures will be implemented to mitigate any potential adverse effects on the single-family residential neighborhood to the south?
- 3. How will the development enhance connectivity and accessibility for residents between the new mixed-use site and the existing retail and residential areas?
- 4. What strategies will be employed to maintain a harmonious transition between the high-density residential area to the north and the single-family residential area to the south?
- 5. How will the project address potential traffic congestion at the intersections of Mission Grove Parkway, Alessandro Boulevard, and Mission Village Drive?
- 6. What parking solutions are being considered to accommodate the needs of both the new residential units and the existing retail establishments?
- 7. How will the proposed development impact the local infrastructure, such as schools, parks, and public services, and what improvements are planned to support these changes?

- 8. What environmental considerations have been made to ensure the project does not negatively impact the surrounding residential neighborhoods?
- 9. How will the project contribute to the overall aesthetics and urban design of the Mission Grove area?
- 10. What input has been received from the residents of the single-family and multi-family neighborhoods, and how has this feedback influenced the project design?

#### Section 3.3.1

The proposed Project includes a General Plan Amendment (GPA) to change the existing General Plan Land Use Designation of the project site from C - Commercial to MU-U - Mixed Use-Urban, to allow residential land use.

- 1. This is not an urban area and the proposed project is not Mixed Use.
- 2. Can you provide specific examples or case studies where similar suburban areas have successfully transitioned to Mixed Use-Urban designations, and how those transitions impacted the local community and environment?
- 3. What specific elements of the proposed project will ensure that it meets the criteria for Mixed Use-Urban zoning, particularly in terms of integrating residential and commercial uses in a way that benefits the community?
- 4. How does the proposed project plan to address potential increases in traffic and parking demands, given that the area is not currently designed to support high-density residential use?
- 5. Can you provide detailed plans or designs that demonstrate how the proposed project will integrate residential and commercial elements to create a true mixed-use environment, rather than just a high-density residential project?
- 6. What specific benefits does the proposed General Plan Amendment and zoning change offer to the existing community, and how do these benefits outweigh the potential negative impacts identified in the EIR?

#### Section 3.3.2

The proposed Project includes a Zoning Code Amendment (RZ) to change the existing zoning of the project site from CR-SP Commercial Retail and Specific Plan (Mission Grove) Overlay Zones to MU-U-SP – Mixed Use-Urban and Specific Plan (Mission Grove) Overlay Zones.

- 1. What specific changes in land use are expected with the zoning code amendment from Commercial Retail to Mixed Use-Urban, and how will these changes benefit the community?
- 2. How does the proposed zoning code amendment align with the overall vision and objectives of the Mission Grove Specific Plan?
- 3. What types of commercial and residential uses are envisioned under the new Mixed Use-Urban zoning, and how will they be integrated?
- 4. How will the zoning code amendment impact existing businesses within the Commercial Retail zone, and what measures are being taken to support these businesses during the transition?
- 5. Can you provide examples of similar projects where a zoning code amendment to Mixed Use-Urban has been successful, and what lessons have been learned from those projects?
- 6. What provisions are included in the Specific Plan to ensure that the mixed-use development promotes walkability, community engagement, and sustainable living?
- 7. How will the zoning code amendment address potential concerns regarding increased traffic, parking availability, and public transportation needs?
- 8. What design guidelines and architectural standards will be implemented to ensure that the new development complements the existing character of the Mission Grove area?
- 9. How will the proposed zoning change affect property values and housing affordability in the surrounding neighborhoods?
- 10. What community outreach and stakeholder engagement activities have been conducted to gather input on the proposed zoning code amendment, and how has this feedback influenced the project design?

## Section 3.3.4

The proposed Project includes Tentative Parcel Map (TPM) 38598 (Figure 3.0-6 – Tentative Parcel Map) to subdivide the existing Parcel 1 of Parcel Map 26320 into two parcels for financing and conveyance purposes. Proposed Parcel 1 (Project site) would total 9.92 acres, similar shape and size as APN 276-110-018 with only minor realignment of parcel line in the southwest corner. The remainder parcel, currently developed with the Mission Grove shopping center, will be approximately 9.35 acres and will be similar to the combined APNs 276-110-012, -014, -015, -016, and -017 in shape and size with only minor realignment of parcel line in the southeast corner. As TPM 38598 creates legal parcels for financing purposes, the TPM itself would not have a significant effect on the environment and is not discussed in detail in this EIR.

1. What specific financing and conveyance purposes are intended for the subdivision of the existing Parcel 1 into two parcels?

- 2. How will the realignment of parcel lines in the southwest and southeast corners impact the overall development and existing infrastructure?
- 3. What are the short-term and long-term plans for the newly created parcels in terms of development and use?
- 4. How will the subdivision affect the operations and accessibility of the existing Mission Grove shopping center?
- 5. What measures will be taken to ensure that the subdivision does not disrupt existing utilities and services within the area?
- 6. How does the subdivision support the overall goals and vision of the proposed Mixed Use-Urban development?
- 7. Will there be any changes in zoning or land use regulations for the newly created parcels, and if so, what are they?
- 8. How will the proposed subdivision impact the existing property values and real estate market in the surrounding area?
- 9. What steps are being taken to ensure that the subdivision process is compliant with all local, state, and federal regulations?
- 10. How will the community and local stakeholders be informed and involved in the subdivision process, and what opportunities will they have to provide input?

Riverside County ALUC Consistency with MARB/IPA Analysis and Findings - The Project's proposed residential density of 35.0 du/ac exceeds the maximum allowable residential density for Zone C2 of 6.0 du/ac.

- 1. What are the specific reasons for proposing a residential density of 35.0 du/ac, which exceeds the maximum allowable density for Zone C2?
- 2. How does the proposed project plan to address the inconsistency with the MARB/IPA residential density guidelines?
- 3. What potential impacts could arise from exceeding the maximum allowable residential density in Zone C2, particularly in terms of noise, safety, and air traffic?
- 4. Are there any precedent cases where similar projects have been granted exceptions to the residential density limits in Zone C2, and what were the outcomes?
- 5. How does the proposed density compare to other developments in the vicinity of March Air Reserve Base/Inland Port Airport (MARB/IPA)?
- 6. What mitigation measures are being proposed to minimize any adverse effects associated with the higher residential density?
- 7. What feedback has been received from the Airport Land Use Commission (ALUC) regarding the proposed density, and how is the developer addressing their concerns?
- 8. How will the project ensure the safety and well-being of residents given the proximity to the airport and the higher residential density?
- 9. What alternative designs or configurations were considered to comply with the maximum allowable density, and why were they not pursued?

10. How will the proposed density impact the overall feasibility and economic viability of the project?

March Air Reserve Base/United States Air Force Input -On July 31, 2023, the Air Force provided comments supporting ALUC's recommendation of inconsistency due to concerns with the project's inconsistent density.

- 1. What specific aspects of the project's density were flagged as inconsistent by the Air Force?
- 2. How does the Air Force define "inconsistent density" in the context of this project?
- 3. Were there any proposed solutions or mitigation measures suggested to address the density concerns?
- 4. What impact could inconsistent density have on the base's operations or surrounding community?
- 5. Has the project undergone any environmental impact assessments related to density changes?
- 6. Are there any historical precedents or similar cases where density issues were resolved successfully?
- 7. How does the inconsistency affect the overall mission readiness of the Air Force at March Air Reserve Base?
- 8. Were there any consultations with local stakeholders or community members regarding the density issue?
- 9. What steps are being taken to ensure compliance with ALUC's recommendation?
- 10. <u>Is there a timeline for addressing the density concerns and implementing any necessary changes?</u>

## Section 5.17.5

Environmental Impacts - Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?The City's guidelines provide guidance regarding VMT analysis based on land use types.10. Implement Subsidized or Discounted Transit Program (TRT-4).In conclusion, while the previously discussed TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent, these measures would not reduce the Project-generated VMT impact to a less than significant level.

- 1. Can you provide more details about the specific Transportation Demand Management (TDM) measures you're planning to implement, beyond the subsidized or discounted transit program mentioned?
- 2. Given that the proposed TDM measures are not sufficient to reduce the VMT impact to a less than significant level, what additional strategies are you considering to further mitigate this impact?
- 3. How did you arrive at the 17.7 percent potential reduction in VMT through your proposed measures? Can you provide more details on this calculation?
- 4. Have you conducted any studies or surveys to understand the likely adoption rate of these TDM measures among future residents or users of your development?
- 5. Are there any innovative or cutting-edge VMT reduction strategies you're exploring that go beyond traditional TDM measures?
- 6. How does your project's projected VMT compare to similar developments in the area, and what factors contribute to any differences?
- 7. Have you considered partnering with local businesses or institutions to create shared transportation solutions that could further reduce VMT?
- 8. What specific features of your project design (e.g., mixed-use elements, walkability enhancements) contribute to VMT reduction, and how effective do you expect these to be?
- 9. How do you plan to monitor and report on the effectiveness of your VMT reduction measures once the project is operational?
- 10. Given that your measures don't fully mitigate the VMT impact, how do you justify the project's transportation-related environmental impacts in the broader context of its benefits to the community?

#### **Section 5.17.5**

Parking - Unbundle Residential Parking Costs from Property Cost. According to CAPCOA, increasing the cost of owning a vehicle will decrease or discourage vehicle ownership and therefore reduce VMT and GHG. CAPCOA transportation Measure T-16, Unbundle Residential Parking Costs from Property Cost, was used to estimate the amount of VMT reduction that can be achieved by charging for additional parking stalls. The Project proposes to provide 1 parking stall to every apartment unit within the rental unit fee (no additional charge) and charge \$75 per month for any and each additional parking spaces, which may reduce Project VMT by up to 3.9%.

- 1. How did you determine that \$75 per month is an appropriate price for additional parking spaces? Did you conduct any market studies or comparisons with similar developments?
- 2. Have you considered a tiered pricing structure for additional parking spaces to further discourage multiple car ownership?

- 3. What measures are you taking to ensure that this parking strategy doesn't result in increased on-street parking in surrounding neighborhoods?
- 4. How do you plan to communicate this parking policy to potential residents, and what strategies will you use to encourage single-car households?
- 5. Have you considered offering any incentives for residents who choose not to use their included parking space, such as reduced rent or alternative amenities?
- 6. What provisions are you making for visitor parking under this unbundled parking scheme?
- 7. How does your parking strategy align with or impact local public transportation usage? Have you considered partnering with local transit authorities to offer alternatives to car ownership?
- 8. Are you incorporating any smart parking technologies or systems to manage and optimize parking usage within the development?
- 9. How flexible is your parking plan? Can you adapt the number of available spaces or pricing structure if demand patterns change over time?
- 10. Given that this measure is expected to reduce VMT by up to 3.9%, what other complementary strategies are you considering to further reduce vehicle dependency among residents?

#### Section 6.2

Significant and Unavoidable Adverse Impacts - VMT: VMT mitigation measures and strategies aim to promote overall mobility with the goal of reducing VMT and GHG emissions. Implementation of the project design features and TDM measures outlined in Section 5.17 Transportation, may possibly reduce the proposed Project's VMT by approximately up to 17.7 percent. These TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent but will not reduce the impact to a less than significant level. Therefore, the proposed Project would have significant and unavoidable impacts related to transportation.

- 1. Given that the proposed TDM measures are insufficient to reduce VMT impacts to a less than significant level, what additional innovative strategies have you considered to further decrease VMT?
- 2. How do you justify proceeding with the project despite the significant and unavoidable impacts related to transportation?
- 3. Have you explored the possibility of partnering with local businesses or institutions to create shared transportation solutions that could further reduce VMT?
- 4. What specific features of your project design, beyond the TDM measures, contribute to VMT reduction, and how effective do you expect these to be?
- 5. How does your project's projected VMT compare to similar developments in the area, and what factors contribute to any differences?

- 6. Have you considered any off-site mitigation measures to offset the remaining VMT impacts that cannot be mitigated on-site?
- 7. What long-term monitoring and reporting mechanisms do you plan to implement to track the effectiveness of your VMT reduction strategies over time?
- 8. How do you plan to educate and encourage residents to participate in the TDM measures to maximize their effectiveness?
- 9. Have you explored the potential for future technological advancements (such as autonomous vehicles or improved electric vehicle infrastructure) that could help mitigate VMT impacts in the long term?
- 10. Given the significant and unavoidable transportation impacts, how do you plan to balance these against the project's benefits to the community in your overall project justification?

#### Alternative Uses - Section 7.0

The following discussion considers alternatives to implementing the Project and examines the potential environmental impacts resulting from each alternative. By comparing these alternatives to the Project, the relative advantage(s) can be weighed and analyzed.

- 1. Can you provide a detailed comparison of how each alternative's environmental impacts differ from the proposed project, particularly in areas of significant concern?
- 2. How did you determine the range of alternatives to be analyzed? Were there any alternatives considered but ultimately rejected from detailed analysis, and if so, why?
- 3. For each alternative, can you explain how it would meet or fail to meet the project objectives as compared to the proposed project?
- 4. Are there any alternatives that would reduce or avoid the significant and unavoidable impacts identified for the proposed project, particularly regarding VMT and transportation?
- 5. How do the various alternatives compare in terms of economic feasibility? Are there any that would be particularly challenging to implement from a cost perspective?
- 6. Can you discuss any trade-offs between environmental benefits and project objectives for each alternative? How did you weigh these factors?
- 7. Are there any innovative or unconventional alternatives that were considered which might offer unique solutions to the environmental challenges identified?
- 8. How do the alternatives address community concerns or feedback that may have been received during the scoping process or public comment periods?
- 9. For the alternative(s) that appear to have the least environmental impact, what are the main drawbacks or challenges that would make them less desirable than the proposed project?

10. Is there a potential "hybrid" alternative that combines elements from different alternatives to maximize benefits and minimize impacts? If so, has this been considered in your analysis?

#### Alternative Uses - Section 7.0.2

State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)).

- 1. How did you determine the range of alternatives to be analyzed in the EIR? Can you explain the process and criteria used to ensure a "reasonable range" was considered?
- 2. Were there any alternatives suggested during the scoping process or public comment periods that were not included in the final analysis? If so, why were they deemed infeasible or unreasonable?
- 3. How do each of the analyzed alternatives specifically address the significant effects identified for the proposed project?
- 4. Can you provide a comparative analysis of how each alternative meets the basic project objectives relative to the proposed project?
- 5. Are there any alternatives that would require changes to existing zoning or land use designations? If so, how feasible are these changes?
- 6. How do the alternatives compare in terms of their ability to meet regional housing needs or other community goals?
- 7. Were any off-site alternatives considered? If so, what factors were evaluated in determining their feasibility?
- 8. Can you explain how the "rule of reason" was applied in selecting the alternatives for detailed analysis?
- 9. How do the alternatives address cumulative impacts identified in the EIR, particularly those that may be significant and unavoidable?

10. Is there a clear "environmentally superior alternative" among those analyzed? If so, what are the main trade-offs between this alternative and the proposed project?

#### Alternative Uses - Section 7.0.3

The No Project alternative would not fulfill any of the Project's objectives as the existing site would not provide high-quality housing in close proximity to many amenities and high-quality transit corridors, assist the City of Riverside in meeting housing needs, use land resources more efficiently with infill redevelopment on an underutilized vacant site; or further the City's Climate Action Plan by replacing aging building construction with green building practices and other sustainable development methods. Under this alternative, no improvements would be made to the Project site, and the site would continue to be vacant with temporary/seasonal retail tenants.

- 1. Given that the No Project alternative doesn't meet any of the project objectives, can you elaborate on why it's important to include this alternative in the EIR analysis?
- 2. How does the environmental impact of leaving the site vacant compare to the impacts of your proposed project, particularly in terms of land use efficiency and sustainability?
- 3. Are there any positive environmental impacts of the No Project alternative that should be considered, such as preservation of open space or reduced traffic?
- 4. How does the No Project alternative align with or conflict with the City's long-term development plans and goals for this area?
- 5. Can you provide more details about the current temporary/seasonal retail tenants and how their economic contribution compares to the potential economic benefits of your proposed project?
- 6. How does the No Project alternative impact the City's ability to meet its housing needs and obligations?
- 7. Are there any missed opportunities for implementing green building practices or sustainable development methods if the No Project alternative is chosen?
- 8. How would leaving the site as is affect the surrounding neighborhood in terms of property values, local amenities, or community character?
- 9. Does the No Project alternative have any implications for the City's Climate Action Plan goals? If so, can you quantify these impacts?
- 10. Given that the site is described as "underutilized," are there any foreseeable alternative uses for the site that might emerge in the future if your project doesn't proceed?

#### Section 4.3

Developments Considered in Cumulative Impact Analysis Total of six (6) developments • One residential development with 54 residential dwelling units • Three commercial developments • Two distribution warehouses • Meridian Specific Plan – West Campus Upper Plateau Project with warehouses for high-cube fulfillment and cold storage, business park office, warehouse, and mixed-use buildings, retail, and park (active and public).

- 1. **Cumulative Impact Analysis**: How do you plan to address the cumulative environmental impacts of the six developments, particularly in terms of air quality, traffic congestion, and infrastructure strain?
- 2. **Residential Development Impact**: What specific measures will be taken to mitigate the environmental impacts of the residential development with 54 dwelling units, especially concerning local wildlife and habitat connectivity?
- 3. **Commercial Developments**: How will the three commercial developments integrate with the existing community infrastructure, and what steps will be taken to minimize their environmental footprint?
- 4. **Warehouse Developments**: What are the anticipated environmental impacts of the two distribution warehouses, particularly regarding noise, air pollution, and traffic, and how will these be mitigated?
- 5. **Meridian Specific Plan**: Can you provide a detailed analysis of the environmental impacts of the Meridian Specific Plan West Campus Upper Plateau Project, including its high-cube fulfillment and cold storage warehouses, business park office, and mixed-use buildings?
- 6. **Public Participation**: How will you ensure that the local community is adequately informed and involved in the decision-making process for these developments, particularly those most affected by the changes?
- 7. **Infrastructure Capacity**: Given the scale of the proposed developments, what assessments have been conducted to ensure that local infrastructure (roads, utilities, public services) can support the increased demand?
- 8. **Sustainable Practices**: What sustainable building practices and green technologies will be implemented in these developments to minimize their environmental impact?

- 9. **Traffic Mitigation**: What specific traffic mitigation strategies will be employed to handle the increased vehicle flow from these developments, and how will these strategies be monitored and adjusted over time?
- 10. **Long-term Monitoring**: What long-term environmental monitoring programs will be put in place to assess the ongoing impacts of these developments, and how will the findings be used to make necessary adjustments?

#### Section 5.1.1

Aesthetics-Setting: Although the majority of the City is urbanized

- This is not true and no evidence has been provided to support this statement.
- Can you provide specific data or studies that support the claim that the majority of the City is urbanized? What metrics or criteria were used to make this determination?
- 1. **Urbanization Evidence**: Can you provide specific data or studies that support the claim that the majority of the City is urbanized? What metrics or criteria were used to make this determination?
- 2. **Visual Impact Analysis**: How will the proposed project impact the visual character of the area, particularly in non-urbanized sections? Can you provide visual simulations or renderings from various vantage points?
- 3. **Compatibility with Surroundings**: How does the project design ensure compatibility with the existing aesthetic and architectural character of the surrounding area, especially in less urbanized sections?
- 4. **Mitigation Measures**: What specific mitigation measures will be implemented to minimize any negative aesthetic impacts of the project on the local community?
- 5. **Community Feedback**: Have you conducted any community consultations or surveys to gather feedback on the visual impact of the proposed project? If so, what were the findings and how have they been addressed?

- 6. **Green Spaces**: How will the project incorporate green spaces and landscaping to enhance the visual appeal and mitigate the urbanization effect?
- 7. **Lighting Impact**: What measures will be taken to ensure that the project's lighting does not contribute to light pollution or negatively impact the night-time aesthetics of the area?
- 8. **Historical and Cultural Considerations**: How does the project take into account any historical or cultural landmarks in the area, and what steps are being taken to preserve or enhance these features?
- 9. **Long-term Aesthetic Monitoring**: What long-term monitoring and maintenance plans are in place to ensure that the aesthetic quality of the project is maintained over time?
- 10. **Alternative Designs**: Have alternative designs been considered that might better preserve the existing visual character of the area? If so, can you provide details on these alternatives and why they were not selected?

#### Section 5.1.5

Threshold C: In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

- 1. Can you provide detailed visual simulations or renderings of the project from multiple publicly accessible vantage points to demonstrate its impact on the existing visual character and quality of the area?
- 2. What specific design elements or architectural features have been incorporated to ensure the project integrates harmoniously with the existing commercial space and surrounding area?
- 3. How does the project's height, massing, and scale compare to the existing buildings in the area, and what measures will be taken to mitigate any potential negative visual impacts?

- 4. Have you conducted any shadow studies to assess the project's impact on light and shadow patterns in the surrounding area, particularly on adjacent commercial properties?
- 5. What landscaping plans have been developed to soften the visual impact of the project and enhance its integration with the existing environment?
- 6. How does the project comply with local design guidelines and zoning regulations related to scenic quality and visual character?
- 7. Have you considered alternative designs or configurations that might better preserve the continuity of the commercial space while still meeting the project's objectives?
- 8. What specific measures will be implemented to mitigate the visual impact during the construction phase, which could last for an extended period?
- 9. How do you plan to address potential light pollution from the project, especially if it's taller than surrounding buildings, and what measures will be taken to minimize nighttime glare?

#### Section 5.3.5

Environmental Impacts - Threshold B: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

- 1. Can you provide a detailed air quality impact analysis that specifically addresses the cumulative effects of adding 600-800 vehicles daily to the area, particularly during peak morning and evening hours?
- 2. What specific mitigation measures, beyond modifying traffic signals, are proposed to reduce the cumulative air quality impacts from the increased vehicle traffic generated by the project?
- 3. Have you conducted any air quality modeling to assess the potential increase in criteria pollutants, especially those for which the region is already in nonattainment? If so, can you share the results and methodology?
- 4. How does your project plan to encourage alternative transportation methods to reduce reliance on personal vehicles and mitigate air quality impacts?

- 5. Can you provide a comprehensive analysis of how the project's cumulative air quality impacts, when combined with other planned developments in the area, align with regional air quality improvement goals and plans?
- 6. What specific technologies or design features will be incorporated into the project to minimize emissions from both construction and operational phases?
- 7. How will the project address potential health impacts on nearby sensitive receptors (e.g., schools, hospitals, residential areas) due to increased air pollution from additional traffic?
- 8. Have you considered implementing a transportation demand management (TDM) program to reduce single-occupancy vehicle trips? If so, what specific measures would be included?
- 9. Can you provide an analysis of how the project's air quality impacts might change under different future scenarios, such as increased adoption of electric vehicles or changes in regional transportation patterns?
- 10. What long-term monitoring and reporting mechanisms will be put in place to track the actual air quality impacts of the project over time, and how will this information be used to implement additional mitigation measures if needed?

#### Section 6.3

Significant Irreversible Environmental Changes - This section addresses the use of non-renewable resources during initial and continued phases of the Project, the commitment of future generations to environmental changes or impacts because of the Project, and any irreversible damage from environmental accidents associated with the Project. Operation of the Project would irreversibly increase local demand for non-renewable energy resources, such as petroleum products and natural gas. Increasingly efficient building design, however, will offset this demand to some degree by reducing energy demands of the Project.

- 1. Can you provide a detailed analysis of the projected increase in demand for non-renewable energy resources, such as petroleum products and natural gas, due to the operation of the project?
- 2. What specific energy efficiency measures and technologies will be incorporated into the building design to offset the increased energy

- demands? Can you quantify the expected energy savings from these measures?
- 3. Have you conducted a life-cycle analysis of the project's energy consumption, including both construction and operational phases? If so, can you share the results?
- 4. How does the project's energy consumption compare to similar developments in the area, and what benchmarks are you using to ensure best practices in energy efficiency?
- 5. What renewable energy sources, if any, are being considered for integration into the project to reduce reliance on non-renewable resources?
- 6. Can you provide a comprehensive plan for monitoring and reducing energy consumption over the life of the project, including any targets for energy reduction over time?
- 7. How will the project address potential future changes in energy regulations and standards to ensure long-term compliance and efficiency?
- 8. What measures are being taken to educate and encourage future occupants or users of the project to adopt energy-efficient practices?
- 9. Have you considered the potential impacts of climate change on future energy demands for the project, such as increased cooling needs? How are these considerations integrated into the project design?
- 10. Can you provide a detailed analysis of the project's impact on local utility infrastructure and any necessary upgrades or modifications to accommodate the increased demand?

#### Section 6.3.2

Commitment of Future Generations - Approval of the Project would result in environmental changes or impacts that commit future generations to new environmental circumstances. Primarily, the approval of the Project would change the underlying GP 2025 land use designations and zoning of the Project site and the Mission Grove Specific Plan land use and zoning, as detailed in Section 5.11, Land Use and Planning. The change in the underlying regulations would allow for a change from C - Commercial to MU-U - Mixed Use-Urban for a multi-family development. This would result, in turn, in an increase in population as compared to commercial development as envisioned in the City's GP 2025.

- 1. How do you plan to ensure that the voices and concerns of the local community, particularly those most affected by the project, are adequately heard and addressed throughout the planning and approval process?
- 2. Can you provide a detailed analysis of the long-term environmental, social, and economic impacts of changing the land use designation from Commercial to Mixed Use-Urban on the local community?
- 3. What specific measures will be implemented to mitigate the potential negative impacts of increased population density on local infrastructure, public services, and community resources?
- 4. How does this project align with the overall vision and goals of the Mission Grove Specific Plan and the City's General Plan 2025? If there are discrepancies, how do you justify the proposed changes?
- 5. What precedent-setting implications might this project have for future development in the area, and how do you plan to address concerns about potential erosion of existing zoning regulations?
- 6. Can you provide examples of similar projects where changes in land use designations have been successfully implemented without negatively impacting the local community or setting problematic precedents?
- 7. What specific mechanisms will be put in place to ensure ongoing community involvement and oversight throughout the project's lifecycle, including after completion?
- 8. How do you plan to balance the need for increased housing with the preservation of the area's existing character and the original vision set forth in the General Plan 2025?
- 9. What studies have been conducted to assess the potential long-term environmental impacts of this land use change, particularly in terms of traffic, air quality, and resource consumption?
- 10. How will the project address potential intergenerational equity issues, ensuring that future generations are not unduly burdened by the environmental and social changes resulting from this development?

## Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan,

ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Brian Kerr 214 Bathurst Road Riverside, CA 92506 Mission Grove Neighborhood Alliance From: Chris Bardeen <cbardeen951@gmail.com>

**Sent:** Sunday, June 23, 2024 1:01 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Comments on Draft EIR for Mission Grove Apartment Project

Attachments: Kmart EIR letter-1.pdf

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Dear Ms. Hernandez,

Please find attached a letter detailing my comments and questions on the draft EIR for project 2022100610. I hope that the PDF attachment counts as "sent in writing", but please let me know if you need a hard copy.

Thanks, Chris

Chris Bardeen 238 Gracefield Way Riverside, CA 92506 City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, California 92522
Attn: Veronica Hernandez, Senior Planner
(951) 826-3965
vhernandez@riversideca.gov

Dear Ms. Hernandez,

Please find below my comments on the Draft EIR for the proposed Mission Grove apartment complex:

I have tried to focus on areas where the EIR has clear errors of fact or insufficient analysis. My comments are detailed, basically in order to help the drafters understand my concerns. Direct quotes from the EIR are italicized, and I have also tried to summarize the main points in the form of underlined questions. All page numbers refer to the PDF file. Thank you for your consideration.

Chris Bardeen 238 Gracefield Way Riverside, CA 92506

Comments on

PROJECT TITLE: Mission Grove Apartments

CASE NUMBER: PR-2022-001359

1) Error of fact: On p. 277, p. 486 the EIR claims that the Estancia Apartments has 208 units with a density of 1.3 dwelling units (du) per acre. These numbers imply that the complex covers approximately 200 acres, which is not true.

What is the origin of the Estancia inconsistency?

2) **Effects on neighborhood aesthetics**: The current Kmart building is about 20 feet high at its rear and for most of its circumference. The proposed building is 57.3 feet high around the entire circumference of the site. It will be visible from Allesandro and abut Mission Grove. The largest impact will be on the single-family homes on Mission Village Drive South. From the map provided on p. 64, the backyards of these homes will be about 200 feet from the apartment buildings which are 60 feet high. From this perspective, replacing the 20 foot high Kmart with the 60 foot high apartment building is equivalent to changing a boundary fence 20 feet away from 2 to 6 feet high, which would be noticeable for most people. The pictures on p. 100-101 of the development do not show this perspective, nor do they compare the current view to how it will be changed by the construction of a 60 foot high complex. There will be a set of houses which will have a large apartment building looming over their yards, with windows that afford the apartment residents clear views into the homeowners' yards.

The EIR description of the site is partially accurate, but I could not find where the changed visibility due to the height of the project was predicted, e.g on p. 92: "The Project site is visible by motorists and pedestrians walking alongside and driving Mission Village Drive and Mission Grove Parkway South, and is partially visible from Alessandro Boulevard. The backside of the existing vacant building is also visible to the residential neighborhood located to the south, across from Mission Village Drive."

In the context of the Mission Grove Specific Plan, the EIR seems to say that current project does not have to follow the recommended set backs because it is higher density than the surrounding neighborhood. See p. 94: "The remaining standards do not apply to the proposed Project as they are for lower density residential than the proposed Project and for commercial and industrial development."

Why were no estimates of the increased building visibility, due to its 60 foot height, included in the EIR?

Why was the impact on home owners in the Mission Village Drive area not taken into consideration?

What Mission Grove Specific Plan regulations on set-backs and height are applicable to this project?

3) Effects of aircraft noise on apartment residents: The EIR states in many places that the development lies outside the 65 dBA CNEL noise contour. The CNEL is a weighted average over 24 hours and does not reflect single event noise levels, like those due to a truck passing or an airplane passing overhead. The important noise level for residents of the development will be the Single Event Noise Equivalent Level (SENEL) which was not measured or estimated. These single event noises typically come from overhead flights coming from March Air Reserve Base (MARB).

The closest measurement is Table 5.13-3 (p. 372), where maximum noise levels reached 77 dBA. Surprisingly, these measurements were not made in the presence of airplane flights, or during evening hours. Previous experience with MARB flights during the period 2005-2008 showed that SENEL noise levels could exceed 70 dBA indoors with windows closed. It is reasonable to expect that the residents of the apartment complex would experience high noise level events due to aircraft overflights. Cargo traffic out of MARB is proposed to increase to 17 flights daily, with several at night after 10 pm, so the problem of night-time airplane noise will only get worse. The probability of being awakened by a noise event can be calculated. Why were SENEL levels not calculated?

Why were awakening probabilities for apartment residents not calculated?

Tall buildings are more susceptible to air vibrations – was this taken into account?

The EIR's solution to this problem is simply to have prospective residents sign agreements stating there will be aircraft noise, as stated on p.390

MM NOISE-3: A program to inform prospective purchasers of dwelling units within the Specific Plan area of high aircraft noise levels shall be submitted by the developer of City review and approval prior to issuance of any residential building permits. This program shall include a letter to be provided to the purchaser prior to completion of the sale.

MM NOISE-4: Appropriate avigation and noise easements for all residentially developed property

shall be prepared for City and U.S. Air Force review and approval and recorded prior to approval of implementing land division proposals or issuance of any individual building permits if no land division is proposed.

Most reasonable people would not find that having people sign a statement is not sufficient mitigation for noise. The EIR makes no attempt to quantify health effects, even though noise (both continuous as measured by CNEL and bursts as measured by SENEL) has documented negative effects on physical and mental health. A 2017 review can be found at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5437751/

A 2022 study on the sudden introduction of noise along a flight path at La Guardia can be found at

https://bmjopen.bmj.com/content/12/5/e057209

Impacts included increased insomnia, substance abuse, and cardiovascular disease. Why were possible effects of noise on residents' health not considered?

4) **Analysis of resident/non-resident density**: In many places, the EIR acknowledges that the proposed apartment complex is not compatible with the Airport Land Use Commission (ALUC) regulations, which limit development to 6 du/acre. Nevertheless, the EIR has multiple conflicting statements on this point.

At some points the EIR asserts that it is consistent with ALUC:

- p. 321 "The Project is consistent with the residential development surrounding MARB/IPA, specifically in Zone C2 and will not result in the encroachment of incompatible residential densities affecting current or future March ARB/IPA operations."
- p. 485: "The Project is consistent with the residential development surrounding MARB/IPA, specifically in Zone C2 and will not result in the encroachment of incompatible residential densities affecting current or future March ARB/IPA operations."
- p.486: "The Project is consistent with other multi-family residential developments in the C2 Zone."

At other times, it asserts that the plan is inconsistent:

- p. 268: "The Zone C2, in which the Project is located, is identified as a Flight Corridor Zone, where the risk level is considered "moderate" in the ALUC Countywide Policies Table 3A Compatibility Zone Factors. Per Table 3A Compatibility Zone Factors, "some 10% to 15% of off-runway general aviation accidents near airports occur in this zone," in reference to Compatibility Zone C2. Based on these safety factors, the intent and purpose of Compatibility Zone C2 is to restrict residential density in order to limit the potential risk of an off-field aircraft landing. The Project's proposed residentialdensity of 35.0 du/ac exceeds the maximum allowable residential density for Zone C2 of 6.0 du/ac."
- p. 281: "As previously discussed, the Project's projected residential density of 35.0 dwelling units per acre would be inconsistent with the maximum allowable residential density of 6.0 dwelling units per acre for Compatibility Zone C2. Because the Project would not meet this single MARB/IPA LUCP density compatibility criterion, the Project would result in a significant and unavoidable impact with respect to airport land use compatibility."

The reason the EIR makes these conflicting statements is that it confuses (perhaps on purpose?) two different definitions of density. The first is the residential density, as measured by dwelling units per acre. Here the proposal is clearly in violation of ALUC. Residents are people who live in the area 24 hours/day. These are people who would be sleeping, watching movies, or feeding their children, in the event of an airplane crash.

Nonresidents are shoppers or workers who would be in the area for a maximum of 8 hours/day. They would be alert and awake, easily warned and evacuated if there was an aircraft emergency. Not surprisingly, the allowed density for non-residents under ALUC is much higher, 200 people per acre. The EIR then goes on to argue that since the apartment **resident** density will be less than the maximum allowed **non-resident** density, the planned development actually does conform to the ALUC regulations. For example, on p. 269:

"Pursuant to the MARB/IPA LUCP, the non-residential average intensity for Compatibility Zone C2 is limited to 200 people per acre.

As the Project includes construction of a 347-unit multi-family development including recreational amenities including 2,963 SF of leasing office area, 1,001 SF of pool area,1,293 SF of pool deck area, 2,136 SF of club area, and 2.386 SF of fitness area, accommodating a total occupancy of 311 people, resulting in an average intensity of 31 people per acre, which is consistent with the Compatibility Zone C2 average intensity of 200 people per acre."

These sections of the EIR are very misleading, since they conflate resident and nonresident density requirements, while making no effort to explain why they are different. To see why they are different, one only needs to look at one recent example of what the EIR calls "an off-field aircraft landing", namely the 2019 F-16 crash at MARB. If the warehouse that was impacted by the F-16 had instead been an apartment complex full of sleeping residents, the outcome of that accident would have been very different.

Why did the EIR suggest that residential and non-residential densities are equivalent? Why were the definitions of resident versus non-resident density not clearly defined?

- 5) Analysis of encroachment on MARB. The EIR states claims that the project will not result in encroachment on the function of MARB as a military/cargo airport. However, the EIR also shows that the development will result in a high density housing project that clearly violates the density requirements of the ALUC. Moreover, if successful, it is reasonable to assume that it will set a precedent for the approval of future high density developments that are also incompatible with MARB land use. Once this project is approved, there would be no the legal justification for rejecting future developments with the same or even higher density. Approval of the current proposal would violate ALUC policy as defined by the EIR:
- p. 262: "Policy LU-22.3: Work to limit the encroachment of uses that potentially pose a threat to continued airport operations, including intensification of residential and/or commercial facilities within identified airport safety zones and areas already impacted by current or projected airport noise."

Nevertheless, the EIR goes on to state that the project actually will not result in encroachment, despite all evidence to the contrary. See for example:

p. 277: "The Project is consistent with the residential development surrounding MARB/IPA, specifically in Zone C2 and will not result in the encroachment of incompatible residential

densities affecting current or future March ARB/IPA operations."

p. 485: "The Project is consistent with the residential development surrounding MARB/IPA, specifically in Zone C2 and will not result in the encroachment of incompatible residential densities affecting current or future March ARB/IPA operations."

## Exactly how does the EIR define encroachment?

generated VMT."

<u>How can statements like those on p. 277 and p. 485 be supported from a legal or regulatory standpoint?</u>

<u>How will approval of the current project affect future projects and increase encroachment on MARB?</u>

6) **Analysis of traffic effects**. The analysis of the effects of the project on local traffic levels can be summed up as "Going from bad to worse", with the implication that since it is already bad, adding more traffic will not be too noticeable. The EIR admits this: p. 428: "As shown in Table 5.17-1, Regional and Project VMT Per Capita, the Project VMT per capita is higher than jurisdictional threshold or 85% of baseline or cumulative jurisdictional VMT per capita. Therefore, the proposed Project would result in a significant impact for project

The confusing thing about this analysis is that Table 5.17-2 seems to show that the Project would somehow **decrease** VMT (Vehicle Miles Traveled) by 1,948 in 2018, before the Project or EIR were in existence. In 2045, the numbers at least go in the right direction, with 3,839 additional VMT due to the Project. Given 800 residents, this works out to each resident traveling less than 5 miles by car per year. The analysis seems to assume that each resident relies primarily on mass transit or bicycles. This does not seem realistic because 2022 data that shows each California resident on average travels 12,500 miles per year by car. Why does the project add so few VMT in 2045 given that it adds 800 residents? What is the meaning of the 2018 data in Table 5.17-2?

There are several other areas where the analysis is lacking or non-existent:

A) The Project will remove 2 ingress/egress points to the Mission Grove shopping center: p. 423-424: "Project Driveway 2 will be converted from a right-in-right-out (RIRO) driveway to a right-out egress only driveway. Retail customers would no longer be able to enter and exit Mission Grove Plaza via Project Driveway 2 and Project Driveway 3 on Mission Village Drive upon implementation of the proposed Project, as these driveways will be gated for resident access only. The existing full access shopping center driveway located on Mission Village Drive between Project Driveway 3 and Mission Grove Parkway South will also be removed as the Project is constructed."

The queue analysis only considers the Mission Grove/Allesandro interchange, not the shopping center entrance.

What are the expected effects on shopping center access and left turn delays from Allesandro?

B) The queue analysis appears to only consider left-turn back-ups, but the main problem in the Mission Grove/Allesandro/Trautwein area is delay due to cars traveling straight that get trapped between lights. I could not find any analysis of how much delay would be added to this travel

time. From experience, traffic from I-215 traveling west on Allesandro and traffic traveling north on Trautwein suffer the greatest delays. On some days, the intersections are grid-locked and cars try to cut through neighborhood streets to avoid further delay, leading to heavy traffic on streets like Cannon and Mission Grove that were not designed to handle this volume.

What increased delays are expected for East/West traffic at the intersections adjacent to the Project?

What are the effects of these delays on overflow traffic through residential neighborhoods adjacent to the Project?

C) Finally, the EIR makes no attempt to quantitatively analyze the cumulative effect of the proposed project in combination with all the other proposed projects, especially the newly constructed warehouse on Allesandro and the impending West Plateau project. Instead, it mentions these factors in passing without analyzing their cumulative effect: p. 438: "The planned and pending projects near the Project site, listed in Table 4.0-1 of this EIR, include residential, commercial, distribution warehouse, and Meridian Specific Plan – West Campus Upper Plateau Project with warehouses for high-cube fulfillment and cold storage, business park office, warehouse, and mixed-use buildings, retail, and park (active and public). These planned and pending projects would also increase VMT in the City. Cumulatively, the Project VMT impact is therefore considered significant and unavoidable."

What are the expected cumulative traffic effects due to the Project in combination with other developments?

Is there any upper limit for traffic that can be tolerated by the Mission Grove neighborhood?

From: cinbauer@aol.com

**Sent:** Monday, June 24, 2024 12:53 PM

**To:** Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

%2½%2 Moving the Project to a similar location but mitigating some of the issues.

What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?

%2½%2 Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?

%2½%2 How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?

%2½%2 Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?

%2½%2 Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

## Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Cynthia Bauer, 7265 Ayers Rock Rd, Riverside, CA Mission Grove Neighborhood Alliance

Sent from AOL on Android

From: drxman@att.net

**Sent:** Sunday, June 23, 2024 9:28 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

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#### Summary

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The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

I have been a Mission Grove resident since 1998. I understand growth, but this apartment complex is overwhelming. Traffic is horrendous as it is. All roadways to and from Mission Grove are a mess. The area can not handle hundreds of additional vehicles!

Sincerely,

David Drexler 7096 City View Cir. Riverside, CA. 92506 Mission Grove Neighborhood Alliance

Sent from AT&T Yahoo Mail on Android

From: drxman@att.net

**Sent:** Sunday, June 23, 2024 9:34 PM

**To:** Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.4

%2½%2 Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. %2½%2 Increase the type and amount of housing available consistent with the goals of the City%2½½s Housing Element.

%2½%2 Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City%2½½ housing needs and growth projections.

%2%2 Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.

%20%2 Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.

%22%2 In furtherance of the City%2223 Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.

%2\mathbb{?}%2 Create a mixed-use environment encouraging walkability.

%2½%2 Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.

%2½%2 This is not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likely hood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood.

%2½%2 Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for high-density urban apartments in a suburban neighborhood like Mission Grove?

%2½%2 How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services? %2½%2 What measures will be taken to ensure that the proposed mixed-use development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation?

%2½%2 Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development?
 %2½%2 How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

For a change, listen to the residents who live in Mission Grove. They'll tell you enough smog and traffic is enough. The area cannot handle hundreds and hundreds of cars in the area.

Thank you for your consideration of this letter.

Sincerely,

David Drexler 7096 City View Cir.Riverside, Ca. 92506 Mission Grove Neighborhood Alliance

Sent from AT&T Yahoo Mail on Android

From: David Nunez <dpnhome@yahoo.com>
Sent: Sunday, June 23, 2024 10:29 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance

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Sent: Sunday, June 23, 2024 10:29 AM

To: Hernandez, Veronica

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From: Deb Whitney <surfjade@yahoo.com>
Sent: Sunday, June 23, 2024 4:36 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 3.3.2 The proposed Project includes a Zoning Code Amendment (RZ) to change the existing zoning of the project site from CR-SP Commercial Retail and Specific Plan (Mission Grove) Overlay Zones to MU-U-SP – Mixed Use-Urban and Specific Plan (Mission Grove) Overlay Zones. · All these zoning requirements have been in place for a reason, so the community thrives and attracts new residents with a carefully designed structure and purpose that promotes safety, security and a quality of life. All these necessary changes shows no support for improving the community. • Can you provide specific evidence or studies that demonstrate how the proposed Zoning Code Amendment from Commercial Retail to Mixed Use-Urban will enhance the safety, security, and quality of life for current and future residents of the community? • What measures will be taken to ensure that the proposed zoning changes do not negatively impact the existing community structure and purpose that have been carefully designed to promote thriving neighborhoods? • How does the proposed project plan to address potential concerns from residents regarding the integration of high-density residential units into an area currently zoned for commercial retail, particularly in terms of maintaining community cohesion and character? • Can you provide detailed plans or examples of similar projects where a transition from Commercial Retail to Mixed Use-Urban zoning has successfully improved the community, and what lessons from those projects will be applied here? • What specific benefits does the proposed Zoning Code Amendment offer to the existing community, and how do these benefits outweigh the potential negative impacts identified in the EIR, particularly in terms of traffic, parking, and overall community integration? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely Deb Whitney 6790 Missin Grove Pkwy N Riverside, CA 92506 Mission Grove Alliance From: Deb Whitney <surfjade@yahoo.com>
Sent: Sunday, June 23, 2024 4:35 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Sincerely,

Deb Whitney 6790 Mission Grove Pkwy N Riverside CA 92506 Mission Grove Alliance From: Deb Whitney <surfjade@yahoo.com>
Sent: Sunday, June 23, 2024 4:34 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented unbiased; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Alternative Uses - Section 7.0.2 State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)). • These alternative selections are not market-driven but simply as they relate to the project's significant effects. The city advocates for the project, so they will not be looking for objective and relevant alternatives unless they meet their needs. How did you determine the range of alternatives presented in the EIR, and can you provide evidence that these alternatives genuinely address the project's significant environmental effects? • Given that the City is described as an advocate for the project, what measures have been taken to ensure an objective evaluation of alternatives that may not align with the City's preferences? • Can you explain the process used to assess the feasibility of each alternative, particularly those that might substantially lessen environmental impacts but may not fully align with the City's goals? • How have you incorporated public input, especially from stakeholders who may have differing views from the City, into the selection and evaluation of project alternatives? • What criteria were used to determine that the presented alternatives would "foster informed decision-making and public participation," and how can you demonstrate that these criteria were applied objectively? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan,

Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Deb Whitney 6790 Mission Grove Pkwy N Riverside, CA 92506 Mission Grove Alliance From: Deb Whitney <surfjade@yahoo.com>
Sent: Sunday, June 23, 2024 4:33 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Alternative Uses - Section 7.0 The following discussion considers alternatives to implementing the Project and examines the potential environmental impacts resulting from each alternative. By comparing these alternatives to the Project, the relative advantage(s) can be weighed and analyzed. • These alternatives are not based on any feasibility study, local market analysis, or other independent studies to support the statements or conclusions. Studies have shown that only a tiny percentage of old KMARTS are demolished and replaced with residential housing. • Can you provide specific feasibility studies or local market analyses supporting the viability of converting this KMART site into residential housing? • What percentage of similar KMART conversions to residential housing have been successful in comparable markets, and how does this inform your project's potential success? • Have you conducted any environmental impact assessments to compare the effects of demolition and new construction versus adaptive reuse of the existing KMART structure? • Given that studies show only a tiny percentage of old KMARTs are demolished for residential use, what unique factors make this site suitable for such a conversion? • How does your proposed residential development align with the local community's long-term urban planning goals and housing needs, and can you provide data to support this alignment? • Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance

Sincerely

Deb Whitney 6790 Mission Grove Pkwy N Riverside, CA 92506 From: Deb Whitney <surfjade@yahoo.com>
Sent: Sunday, June 23, 2024 4:37 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Sincerely

**Deb Whitney** 

6790 Mission Grove Pkwy N Riverside, CA 92506

Mission Grove Alliance

From: Debra Fletcher <debkfletcher@gmail.com>

**Sent:** Sunday, June 23, 2024 2:14 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Debrak K Fletcher. 1017 Mission Grove Prkwy North, Riverside, CA 92506 Mission Grove Neighborhood Alliance

Sent from my iPad

From: Debra Fletcher <debkfletcher@gmail.com>

**Sent:** Sunday, June 23, 2024 2:17 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

**Section 5.17.5** 

Environmental Impacts - Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?The City's guidelines provide guidance regarding VMT analysis based on land use types.10. Implement Subsidized or Discounted Transit Program (TRT-4).In conclusion, while the previously discussed TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent, these measures would not reduce the Project-generated VMT impact to a less than significant level.

- The VMT impact cannot be mitigated.
- Given that the proposed TDM measures are insufficient to reduce the Projectgenerated VMT impact to a less than significant level, what additional innovative strategies or technologies have you considered to further mitigate VMT impacts?
- Can you provide a detailed analysis of how the 17.7 percent reduction in VMT was calculated, and what specific assumptions were made in this calculation?
- Have you explored partnerships with local transit agencies or ride-sharing companies to develop more robust transit solutions that could potentially reduce VMT beyond the current projections?
- What specific measures will be implemented to monitor and evaluate the effectiveness of the proposed TDM strategies over time, and how will these findings be used to adjust and improve VMT reduction efforts?
- Given that the VMT impact cannot be fully mitigated, how do you plan to address potential community concerns about increased traffic congestion and related environmental impacts, particularly in the context of the project's consistency with local and regional transportation plans?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance

Sent from my iPad

From: Desiree Friedman <desiree@dfriedman.com>

**Sent:** Monday, June 24, 2024 3:20 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

Attachments: Mission Grove Apartments EIR response.pdf

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Dear Veronica Hernadez,

Please see the attached letter regarding the EIR review for the Mission Grove Apartments.

Please confirm these issues will be reviewed and addressed when considering the approvals by the Planning Department for a project that is NOT well suited for the Mission Grove Shopping Center and area.

Thank you, Desiree Friedman 19268 Mt. Wasatch Dr. Riverside, CA 92508 951-237-6227 Veronica Hernandez, Senior Planner City of Riverside, Planning Division

RE: Mission Grove Apartments EIR, SCH # 2022100610

### Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.9.6

The Project's proposed General Plan designation and zoning of Mixed Use-Urban, is consistent with surrounding development, and would assist in transitioning between commercial and single-family residential uses.

- This statement is misleading. It implies the project as presented is OK, even though it does not meet the ALUC requirements. It is not consistent with surrounding developments. This is an example of the EIR being used as a marketing tool for the project.
- ➤ Can you provide specific data or examples that demonstrate how the proposed Mixed Use Urban designation is consistent with the surrounding development, given that it appears to significantly exceed both ALUC requirements and existing density levels in the area?
- How do you justify the claim that this project would assist in transitioning between commercial and single-family residential uses, considering the substantial difference in density and scale compared to existing neighborhoods? Nothing in the area is taller than 2 stories and yet you propose a 4-story building How is that consistent with the area?
- Given that the project does not meet ALUC requirements, how do you plan to address potential safety and compatibility concerns related to its proximity to March Air Reserve Base? Please provide a detailed comparison of the proposed project's density, height, and overall scale with those of the surrounding developments to substantiate the claim of consistency.

## **Section 5.14.6**

Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

Yes, the project could have as many as 6 people in a one bedroom, potentially doubling the projected occupancy of 839 to over 1600, the population implications have not considered this

- issue as it relates to the local community of Mission Grove with less than 8000 residents. It's the unplanned population growth to the local community that has not been examined.
- Please provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit?
- ➤ How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections? The surrounding traffic and parking will only be worsened with this type of project How do you plan on mitigating that?
- ➤ Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents?

### **Section 5.17.5**

Parking - Unbundle Residential Parking Costs from Property Cost. According to CAPCOA, increasing the cost of owning a vehicle will decrease or discourage vehicle ownership and therefore reduce VMT and GHG. CAPCOA transportation Measure T-16, Unbundle Residential Parking Costs from Property Cost, was used to estimate the amount of VMT reduction that can be achieved by charging for additional parking stalls. The Project proposes to provide 1 parking stall to every apartment unit within the rental unit fee (no additional charge) and charge \$75 per month for any and each additional parking spaces, which may reduce Project VMT by up to 3.9%.

- This section appears to be in violation of AB 1317 signed into law in 2023 and effective in January 2025 with any new certificate of occupancy, requires that all parking be unbundled and charged for separately. With this project being in the middle of a shopping center, not providing enough parking for the number of units, and the tenants being able to opt out of paying for parking since the shopping center parking is free, creates numerous issues for the retail establishments and their customers. This is especially true since occupancy standards allow for up to 6 people in a one bedroom. None of this has been addressed in this report. Please explain how you plan on addressing this?
- ➤ How do you plan to comply with AB 1317, which requires all parking to be unbundled and charged for separately starting in January 2025, given that your current proposal includes one parking stall per apartment unit within the rental fee?
- What specific measures will be implemented to prevent tenants from opting out of paying for parking and instead using the free parking available in the shopping center, potentially causing parking shortages for retail customers?
- Please provide a detailed analysis of the potential impacts on retail establishments and their customers if tenants use the shopping center parking, including any mitigation strategies to address these issues?
- ➤ How do you plan to address the potential for high occupancy rates (up to 6 people in a one-bedroom unit) and the resulting increased demand for parking, which may exceed the provided parking capacity?
- ➤ Have you conducted any studies or assessments to evaluate the effectiveness of unbundling residential parking costs in reducing VMT and GHG emissions, and how do these findings support the proposed parking strategy for this project?

These are only a few of the issues that I have issue regarding the EIR and the overall project of the Mission Grove Apartments. This project does not fit in our community as proposed.

## Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.
Sincerely,
Desiree Friedman
19628 Mt. Wasatch Dr.
Riverside, CA 92508
Mission Grove Neighborhood Alliance

From: Fr Ast <fmastorga@yahoo.com>
Sent: Sunday, June 23, 2024 8:00 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 6.2 Significant and Unavoidable Adverse Impacts - VMT: VMT mitigation measures and strategies aim to promote overall mobility with the goal of reducing VMT and GHG emissions. Implementation of the project design features and TDM measures outlined in Section 5.17 Transportation, may possibly reduce the proposed Project's VMT by approximately up to 17.7 percent. These TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent but will not reduce the impact to a less than significant level. Therefore, the proposed Project would have significant and unavoidable impacts related to transportation. • Significant and unavoidable impacts related to transportation. Lets create a project that will serve the community and provide enhancements. • Given that the proposed TDM measures can only reduce VMT by up to 17.7 percent and will not bring the impact to a less than significant level, what additional or alternative strategies have you considered to further mitigate VMT and GHG emissions? • Can you provide a detailed explanation of the specific TDM

measures outlined in Section 5.17 Transportation, and how each measure contributes to the overall reduction in VMT? • What are the potential long-term impacts on the community if the significant and unavoidable transportation impacts are not fully mitigated, and how do you plan to address these impacts? • Have you explored any partnerships with local transit agencies, businesses, or community organizations to develop more comprehensive solutions for reducing VMT and enhancing overall mobility? • Can you provide examples of similar projects where significant and unavoidable transportation impacts were successfully managed or mitigated, and what lessons from those projects will be applied to ensure the success of this development? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely,

Frank Astorga 106 Sweetwood Ct. Riverside, CA 92506 From: The Adams Family <theadamsfamilyonline@gmail.com>

**Sent:** Sunday, June 23, 2024 9:38 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0

The following discussion considers alternatives to implementing the Project and examines the potential environmental impacts resulting from each alternative. By comparing these alternatives to the Project, the relative advantage(s) can be weighed and analyzed.

- These alternatives are not based on any feasibility study, local market analysis, or other independent studies to support the statements or conclusions. Studies have shown that only a tiny percentage of old KMARTS are demolished and replaced with residential housing.
- Can you provide specific feasibility studies or local market analyses supporting the viability of converting this KMART site into residential housing?
- What percentage of similar KMART conversions to residential housing have been successful in comparable markets, and how does this inform your project's potential success?
- Have you conducted any environmental impact assessments to compare the effects of demolition and new construction versus adaptive reuse of the existing KMART structure?
- Given that studies show only a tiny percentage of old KMARTs are demolished for residential use, what unique factors make this site suitable for such a conversion?
- How does your proposed residential development align with the local community's long-term urban planning goals and housing needs, and can you provide data to support this alignment?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

J. Adams

Mission Grove Neighborhood Alliance

From: James Medlin <jhmedlin@yahoo.com>
Sent: Tuesday, June 25, 2024 6:58 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Alternative Uses - Section 7.0.6 This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative. • Moving the Project to a similar location but mitigating some of the issues. • What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process? • Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns? • How would

relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors? • Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics? • Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance

From: Janis Drexler <jnsdrexler02@gmail.com>

**Sent:** Sunday, June 23, 2024 9:32 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

The GP 2025 Land Use and Urban Design Element additionally provides a number of "smart growth" principles. A major tenet of smart growth includes focusing development in already urbanized areas of the City, rather than spreading growth to urban fringes, which reduces urban sprawl. The Smart Growth Network has defined the ten principles of smart growth:

- Mission Grove is not an already urbanized neighborhood. This project would be defined as spreading growth to urban fringes which is unacceptable according to these principles.
- How does the proposed project align with the smart growth principles outlined in the GP 2025 Land Use and Urban Design Element, particularly the focus on developing already urbanized areas rather than expanding into urban fringes?
- Can you provide specific examples or case studies where similar projects have successfully implemented smart growth principles in suburban or fringe areas, and what lessons from those projects will be applied here?
- What measures will be taken to ensure that the proposed development does not contribute to urban sprawl, and how will it promote sustainable growth within the existing community framework?
- How do you plan to address concerns that the project is expanding growth to urban fringes, and what specific benefits does the project offer that justify this deviation from smart growth principles?
- Have you conducted any community engagement or consultation processes to gather input from local residents and stakeholders regarding the potential impacts of the project on urban sprawl and community character, and if so, what were the findings and how have they been incorporated into the project planning?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Janis Drexler 7096 City View Cir, Riverside, CA 92506 Mission Grove Neighborhood Alliance

From: Jason Anthony Espinoza <JasonAnthony.Espinoza@calbaptist.edu>

**Sent:** Sunday, June 23, 2024 12:20 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.11.2.4

- 1. Mix land uses.2. Take advantage of compact building design.3. Create a range of housing opportunities and choices.4. Create walkable neighborhoods.5. Foster distinctive, attractive communities with a strong sense of place.6. Preserve open space, farmland, natural beauty and critical environmental areas.7. Strengthen and direct development toward existing communities.7. Strengthen and direct development toward existing communities.9. Make development decisions predictable, fair and cost effective.10. Encourage community and stakeholder collaboration in development decisions.
- Putting a large high density residential project in the middle of a suburban neighborhood does not satisfy any of these principles.
- How does your proposed high-density residential project in a suburban neighborhood align with the principle of strengthening and directing development toward existing communities, rather than expanding into less developed areas?
- Can you provide specific examples of how your project will create a walkable neighborhood and foster a distinctive, attractive community with a strong sense of place, given its location in a primarily suburban setting?
- How does your project plan to preserve open space and critical environmental areas, considering it's introducing a high-density development into a less densely populated area?
- What measures are you taking to ensure a range of housing opportunities and choices within your project, and how does this diversity fit within the context of the existing suburban neighborhood?
- How have you incorporated community and stakeholder collaboration in your development decisions, particularly in addressing concerns about the project's compatibility with the suburban character of the area?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance

Sent from my T-Mobile 5G Device Get <u>Outlook for Android</u> From: Jason Anthony Espinoza <JasonAnthony.Espinoza@calbaptist.edu>

**Sent:** Sunday, June 23, 2024 12:19 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 6.3.2

Commitment of Future Generations - Approval of the Project would result in environmental changes or impacts that commit future generations to new environmental circumstances. Primarily, the approval of the Project would change the underlying GP 2025 land use designations and zoning of the Project site and the Mission Grove Specific Plan land use and zoning, as detailed in Section 5.11, Land Use and Planning. The change in the underlying regulations would allow for a change from C - Commercial to MU-U - Mixed Use-Urban for a multi-family development. This would result, in turn, in an increase in population as compared to commercial development as envisioned in the City's GP 2025.

- This project would have a lasting effect on the local area for generations. It would also set a precedent that all the regulations can be waived or overwritten if the local government wants a project that does not meet the current criteria and the people affected the most by the project will struggle to be heard.
- Can you provide a detailed analysis of how the proposed change from C Commercial to MU-U Mixed Use-Urban will impact the long-term land use and zoning consistency within the Mission Grove Specific Plan and the broader GP 2025 framework?
- What specific measures will be taken to ensure that the voices and concerns of the local community, who are most affected by the project, are adequately heard and addressed throughout the planning and approval process?
- How do you plan to mitigate the potential negative impacts of increased population density on local infrastructure, public services, and community resources, given the shift from commercial to multi-family residential development?
- Can you provide examples of similar projects where changes in land use designations and zoning have been successfully implemented without setting a negative precedent for future developments, and what lessons from those projects will be applied here?
- What long-term monitoring and evaluation strategies will be put in place to assess the environmental and social impacts of the project on future generations, and how will these findings be used to inform future land use and zoning decisions?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance

Sent from my T-Mobile 5G Device Get <u>Outlook for Android</u> From: Jason Anthony Espinoza <JasonAnthony.Espinoza@calbaptist.edu>

**Sent:** Sunday, June 23, 2024 12:18 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Alternative Uses - Section 7.0.5

Alternative 3, the Retail Development Alternative, would consist of retaining the existing retail building and associated surface parking lot with only minor improvements to the inside and/or exterior of the building and/or associated surface parking lot and landscaping. The existing building would house a permanent retail tenant utilizing the full square footage of the building for retail.

- Have you conducted a comprehensive market analysis to determine the viability of attracting a large-scale retail tenant for the entire building, and if so, what were the key findings?
- How does the potential economic impact of retaining the site as retail compare to your proposed residential development regarding job creation, local tax revenue, and overall community benefit?
- If selling the property to a retailer is considered, what criteria would you use to ensure the new owner's plans align with the city's long-term development goals and the needs of the surrounding community?
- Have you explored any mixed-use alternatives that could incorporate retail and residential components, potentially preserving some of the existing structure while addressing housing needs?
- Given the trend of repurposing retail spaces for alternative uses, as mentioned in the search results, what innovative approaches have you considered for this site beyond traditional retail or residential development?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance Sent from my T-Mobile 5G Device Get <u>Outlook for Android</u> From: Jason Anthony Espinoza <JasonAnthony.Espinoza@calbaptist.edu>

**Sent:** Sunday, June 23, 2024 12:20 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 6.2

Significant and Unavoidable Adverse Impacts - VMT: VMT mitigation measures and strategies aim to promote overall mobility with the goal of reducing VMT and GHG emissions. Implementation of the project design features and TDM measures outlined in Section 5.17 Transportation, may possibly reduce the proposed Project's VMT by approximately up to 17.7 percent. These TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent but will not reduce the impact to a less than significant level. Therefore, the proposed Project would have significant and unavoidable impacts related to transportation.

- Significant and unavoidable impacts related to transportation. Lets create a project that will serve the community and provide enhancements.
- Given that the proposed TDM measures can only reduce VMT by up to 17.7 percent and will not bring the impact to a less than significant level, what additional or alternative strategies have you considered to further mitigate VMT and GHG emissions?
- Can you provide a detailed explanation of the specific TDM measures outlined in Section 5.17 Transportation, and how each measure contributes to the overall reduction in VMT?
- What are the potential long-term impacts on the community if the significant and unavoidable transportation impacts are not fully mitigated, and how do you plan to address these impacts?
- Have you explored any partnerships with local transit agencies, businesses, or community organizations to develop more comprehensive solutions for reducing VMT and enhancing overall mobility?
- Can you provide examples of similar projects where significant and unavoidable transportation impacts were successfully managed or mitigated, and what lessons from those projects will be applied to ensure the success of this development?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance

Sent from my T-Mobile 5G Device Get <u>Outlook for Android</u> From: Jeff Scott < jeffscottdc@gmail.com>
Sent: Monday, June 24, 2024 11:57 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units.

- The ALUC will allow higher density than 6 du/ac. The surrounding area shows densities as high as 16 du/ac. A 16du/ac with retail on the bottom floor would be more compatible with the area. Especially if the unit mix concentrated on 2 and 3 bedroom.
- Given that the surrounding area shows densities up to 16 dwelling units per acre, why have you chosen a significantly lower density of 58 units for Alternative 2, rather than exploring a middle ground that could better align with the neighborhood character?
- Have you conducted any studies to determine how a mixed-use development with retail on the ground floor and residential units above (at 16 du/ac) would impact local economic vitality and housing affordability compared to your current proposal?
- Can you provide a comparative analysis of the environmental impacts, particularly regarding traffic and infrastructure demands, between your proposed 347-unit development and a potential 16 du/ac mixed-use alternative?
- How would focusing on two and 3-bedroom units in a higher-density scenario affect the project's ability to meet local housing needs, especially for families, compared to your current unit mix?
- Considering that the Airport Land Use Commission (ALUC) allows for higher density than six du/ac, what factors led to the decision to propose such a low-density alternative, and how does this align with broader city planning goals for efficient land use and housing provision?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Jeff Scott 7741 Coatbridge Drive Riverside, CA 92508 Mission Grove Neighborhood Alliance

From: Jen L < jlarrattsmith@gmail.com>
Sent: Sunday, June 23, 2024 8:04 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented unbiased; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)).

- These alternative selections are not market-driven but simply as they relate to the project's significant effects. The city advocates for the project, so they will not be looking for objective and relevant alternatives unless they meet their needs. How did you determine the range of alternatives presented in the EIR, and can you provide evidence that these alternatives genuinely address the project's significant environmental effects?
- Given that the City is described as an advocate for the project, what measures have been taken to ensure an objective evaluation of alternatives that may not align with the City's preferences?
- Can you explain the process used to assess the feasibility of each alternative, particularly those that might substantially lessen environmental impacts but may not fully align with the City's goals?
- How have you incorporated public input, especially from stakeholders who may have differing views from the City, into the selection and evaluation of project alternatives?
- What criteria were used to determine that the presented alternatives would "foster informed decision-making and public participation," and how can you demonstrate that these criteria were applied objectively?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Jen Larratt-Smith Mission Grove Neighborhood Alliance From: Jenny Snodgrass < jjsnodgrass 56@gmail.com>

**Sent:** Sunday, June 23, 2024 5:40 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 2.3 The City held a virtual EIR Public Scoping Meeting on November 2, 2022, from 6 PM to 7 PM. • No data has been provided on how this meeting was communicated and how many residents attended. • Can you provide detailed information on the methods used to communicate the virtual EIR Public Scoping Meeting to the community, including the platforms and channels used for notification? • How many residents attended the virtual EIR Public Scoping Meeting on November 2, 2022, and can you provide a summary of the key concerns or comments raised during the meeting? • What steps were taken to ensure that all potentially affected residents were informed about the meeting, and how did you address any barriers to participation, such as digital access or language differences? • Can you provide data on the overall community engagement efforts for this project, including the number of comments received, the demographic breakdown of participants, and any follow-up actions taken in response to community feedback? • How do you plan to improve future community engagement efforts to ensure broader and more effective participation, particularly for residents who may have been unaware of or unable to attend the initial virtual scoping meeting? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely,
Jenny J. Snodgrass
6741 Berylwood Ct
Riverside, CA 92506
Mission Grove Neighborhood Alliance

From: Jenny Snodgrass < jjsnodgrass 56@gmail.com>

**Sent:** Sunday, June 23, 2024 5:38 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 1.5 The city received only one comment letter in response to the NOP and no comments during the virtual scoping meeting. • Adequate notice was not provided by the City and/or developer. The communication might have met the laws minimum requirements but obviously that is not adequate. • Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change? • How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential? • Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed for car-dependent retail? • What specific shared elements, including parking, are planned between the residential and retail components, and how will these be implemented without negatively impacting the existing retail operations? • Given that the project will

replace a portion of a commercial facility designed to support the neighborhood, how do you plan to mitigate the potential loss of retail services and ensure that the new development still meets the community's needs? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely, Jenny J. Snodgrass 6741 Berylwood Ct Riverside, CA 92506 Mission Grove Neighborhood Alliance From: Jenny Snodgrass < jjsnodgrass 56@gmail.com>

**Sent:** Sunday, June 23, 2024 3:04 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented unbiased; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Alternative Uses - Section 7.0.2 State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)). • These alternative selections are not market-driven but simply as they relate to the project's

significant effects. The city advocates for the project, so they will not be looking for objective and relevant alternatives unless they meet their needs. How did you determine the range of alternatives presented in the EIR, and can you provide evidence that these alternatives genuinely address the project's significant environmental effects? • Given that the City is described as an advocate for the project, what measures have been taken to ensure an objective evaluation of alternatives that may not align with the City's preferences? • Can you explain the process used to assess the feasibility of each alternative, particularly those that might substantially lessen environmental impacts but may not fully align with the City's goals? • How have you incorporated public input, especially from stakeholders who may have differing views from the City, into the selection and evaluation of project alternatives? • What criteria were used to determine that the presented alternatives would "foster informed decision-making and public participation," and how can you demonstrate that these criteria were applied objectively? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely, Jenny J. Snodgrass 6741 Berylwood Ct Riverside, CA 92506 Mission Grove Neighborhood Alliance From: Jenny Snodgrass < jjsnodgrass 56@gmail.com>

**Sent:** Sunday, June 23, 2024 3:01 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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old KMARTs are demolished for residential use, what unique factors make this site suitable for such a conversion? • How does your proposed residential development align with the local community's long-term urban planning goals and housing needs, and can you provide data to support this alignment? • Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance

From: Jenny Snodgrass < jjsnodgrass 56@gmail.com>

**Sent:** Monday, June 24, 2024 11:08 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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potential long-term impacts of deviating from established land use plans and policies on the surrounding community and environment? • How does the proposed project address the purpose of "avoiding or mitigating an environmental effect" as mentioned in Threshold B, given that it appears to conflict with existing land use plans? • Can you provide examples of similar projects in Riverside or comparable cities where significant deviations from established land use plans were approved, and what were the outcomes and lessons learned from those cases? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely, Jenny J. Snodgrass 6741 Berylwood Ct Riverside, CA 92506

Mission Grove Neighborhood Alliance

From: Jim Duncker < jcduncker@gmail.com>
Sent: Monday, June 24, 2024 9:11 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. As a 30 year resident of Mission Grove, I have been witness to the changes in this area due to the breadth of development. While I do encourage progress, said progress should and must be for the betterment of the local community. This development, as proposed, is not beneficial to the community for a number of reasons not the least of which is increased vehicle traffic;

increased vehicle traffic is directly contrary to the government's goal to improve air quality, reduce the impact on local roads and ease of travel. As it is today, Alessandro Boulevard is beyond busy, Monday through Friday it is a freeway by any other name; adding additional housing units is simply a force multiplier. The additional units will bring increased vehicular traffic which results in reduction of air quality, accelerated deterioration of roads and increased traffic.

The traffic is not just "approved traffic", there are many semi trucks whose drivers disregard the vehicle limitations and use Allesandro as a path of travel. The new construction of additional warehouses at Barton and Allesandro has already resulted in additional trucks on Alessandro where their use is restricted.

Additionally, due to the increased traffic and construction, the "drivable condition" of Allesandro has become a vehicle owner's nightmare. The patch of asphalt fixes has resulted in depression and holes which make it nearly unsafe to navigate. I ask that you, as a steward of good policy, consider all of the comments and proposals of the residents of this area to be of greater bearing than those who do not live in this area and who will not experience the adverse impact of their proposal.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units.

- The ALUC will allow higher density than 6 du/ac. The surrounding area shows densities as high as 16 du/ac. A 16du/ac with retail on the bottom floor would be more compatible with the area. Especially if the unit mix concentrated on 2 and 3 bedrooms.
- Given that the surrounding area shows densities up to 16 dwelling units per acre, why have you chosen a significantly lower density of 58 units for Alternative 2, rather than exploring a middle ground that could better align with the neighborhood character?
- Have you conducted any studies to determine how a mixed-use development with retail on the ground floor and residential units above (at 16 du/ac) would impact local economic vitality and housing affordability compared to your current proposal?
- Can you provide a comparative analysis of the environmental impacts, particularly regarding traffic and infrastructure demands, between your proposed 347-unit development and a potential 16 du/ac mixed-use alternative?
- How would focusing on two and 3-bedroom units in a higher-density scenario affect the project's ability to meet local housing needs, especially for families, compared to your current unit mix?
- Considering that the Airport Land Use Commission (ALUC) allows for higher density than six du/ac, what factors led to the decision to propose such a low-density alternative, and how does this align with broader city planning goals for efficient land use and housing provision?

## Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Jim Duncker 225 Clearwood Ave. Riverside, CA. 92506 Mission Grove Neighborhood Alliance From: Jim Duncker < jcduncker@gmail.com>
Sent: Monday, June 24, 2024 9:19 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. In addition, the reduction of retail space will result in an increase of vehicular traffic which is contrary to the overall goal of improved quality of life i.e. cleaner air, less congestion, less road maintenance, etc..

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 3.4

- Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. Increase the type and amount of housing available consistent with the goals of the City's Housing Element.
- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on an underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
- This is not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likelihood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood.
- Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for high-density urban apartments in a suburban neighborhood like Mission Grove?
- How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services?
- What measures will be taken to ensure that the proposed mixed-use development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation?
- Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development?
- How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC

consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Jim Duncker 225 Clearwood Ave. Riverside, CA. 92506 Mission Grove Neighborhood Alliance From: JOSEPH M BUHR < littlejoe925@sbcglobal.net>

**Sent:** Monday, June 24, 2024 10:16 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 5.1.1 Aesthetics-Setting: Although the majority of the City is urbanized • This is not true and no evidence has been provided to support this statement. • Can you provide specific data or studies that support the claim that the majority of the City is urbanized? What metrics or criteria were used to make this determination? • How do you define "urbanized" in the context of this project, and what percentage of the City meets this definition according to your analysis? • Have you conducted a comprehensive land use survey of the City to verify the extent of urbanization? If so, can you share the methodology and results? • How does the level of urbanization in the immediate project area compare to other parts of the City, and how might this impact the project's compatibility with its surroundings? • Given that the statement about urbanization has been challenged, how does this affect your overall assessment of the project's aesthetic impacts, particularly in terms of its compatibility with the existing visual character of the area? Summary The project is currently inconsistent with several City policies and development standards. It

could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance

**From:** Judith Schumacher-Pronovost < judithpronovost@mac.com>

**Sent:** Monday, June 24, 2024 5:11 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 2.3

The City held a virtual EIR Public Scoping Meeting on November 2, 2022, from 6 PM to 7 PM.

- No data has been provided on how this meeting was communicated and how many residents attended.
- Can you provide detailed information on the methods used to communicate the virtual EIR Public Scoping Meeting to the community, including the platforms and channels used for notification?
- How many residents attended the virtual EIR Public Scoping Meeting on November 2, 2022, and can you provide a summary of the key concerns or comments raised during the meeting?
- What steps were taken to ensure that all potentially affected residents were informed about the meeting, and how did you address any barriers to participation, such as digital access or language differences?
- Can you provide data on the overall community engagement efforts for this project, including the number of comments received, the demographic breakdown of participants, and any follow-up actions taken in response to community feedback?
- How do you plan to improve future community engagement efforts to ensure broader and more effective participation, particularly for residents who may have been unaware of or unable to attend the initial virtual scoping meeting?

# Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

I worry about traffic which is already heavy.

I worry about water use.

I worry about overcrowding in our schools.

Thank you for your consideration of this letter.

Sincerely,

Judee Schumacher Pronovost Y614 Blackwood Street Riverside, CA 92506 Mission Grove Neighborhood Alliance Judee Sent from my iPad

**Sent:** Sunday, June 23, 2024 9:35 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 5.9.6

Due to the inconsistency of the maximum residential density, the project would result in a significant and unavoidable impact. There are no feasible mitigation measures that would reduce impacts related to inconsistency with the residential density criteria.

- There is no evidence as to why the project is being considered at all based on this issue. Other than it helps meet the Cities RHNA requirements.
- Given that the project would result in a significant and unavoidable impact due to inconsistency with maximum residential density requirements, what specific justifications can you provide for pursuing this project beyond meeting the City's RHNA requirements?
- Have you explored any alternative designs or configurations that could bring the project closer to compliance with the residential density criteria while still meeting your development goals?
- Can you provide detailed analysis of how the benefits of this project, including its contribution to RHNA requirements, outweigh the significant and unavoidable impacts identified in the EIR?
- What specific measures do you propose to mitigate or offset the negative impacts of exceeding the maximum residential density, even if they cannot fully resolve the inconsistency?
- Have you conducted any studies or community engagement efforts to assess local support or opposition to this project, given its significant deviation from established density requirements?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Larissa Dobrzhinetska 19148 Vintage Woods Drive, Riverside, CA 92508 Mission Grove Neighborhood Alliance Sent from my iPhone

**Sent:** Sunday, June 23, 2024 9:33 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 6.2

Significant and Unavoidable Adverse Impacts - VMT: VMT mitigation measures and strategies aim to promote overall mobility with the goal of reducing VMT and GHG emissions. Implementation of the project design features and TDM measures outlined in Section 5.17 Transportation, may possibly reduce the proposed Project's VMT by approximately up to 17.7 percent. These TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent but will not reduce the impact to a less than significant level. Therefore, the proposed Project would have significant and unavoidable impacts related to transportation.

- Significant and unavoidable impacts related to transportation. Lets create a project that will serve the community and provide enhancements.
- Given that the proposed TDM measures can only reduce VMT by up to 17.7 percent and will not bring the impact to a less than significant level, what additional or alternative strategies have you considered to further mitigate VMT and GHG emissions?
- Can you provide a detailed explanation of the specific TDM measures outlined in Section 5.17 Transportation, and how each measure contributes to the overall reduction in VMT?
- What are the potential long-term impacts on the community if the significant and unavoidable transportation impacts are not fully mitigated, and how do you plan to address these impacts?
- Have you explored any partnerships with local transit agencies, businesses, or community organizations to develop more comprehensive solutions for reducing VMT and enhancing overall mobility?
- Can you provide examples of similar projects where significant and unavoidable transportation impacts were successfully managed or mitigated, and what lessons from those projects will be applied to ensure the success of this development?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Larissa Dobrzhinetska 19148 Vintage Woods Drive, Riverside, 92508 Mission Grove Neighborhood Alliance

Sent from my iPhone

**Sent:** Sunday, June 23, 2024 9:31 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

**Section 5.17.5** 

Environmental Impacts - Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? The City's guidelines provide guidance regarding VMT analysis based on land use types. 10. Implement Subsidized or Discounted Transit Program (TRT-4). In conclusion, while the previously discussed TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent, these measures would not reduce the Project-generated VMT impact to a less than significant level.

- The VMT impact cannot be mitigated.
- Given that the proposed TDM measures are insufficient to reduce the Projectgenerated VMT impact to a less than significant level, what additional innovative strategies or technologies have you considered to further mitigate VMT impacts?
- Can you provide a detailed analysis of how the 17.7 percent reduction in VMT was calculated, and what specific assumptions were made in this calculation?
- Have you explored partnerships with local transit agencies or ride-sharing companies to develop more robust transit solutions that could potentially reduce VMT beyond the current projections?
- What specific measures will be implemented to monitor and evaluate the effectiveness of the proposed TDM strategies over time, and how will these findings be used to adjust and improve VMT reduction efforts?
- Given that the VMT impact cannot be fully mitigated, how do you plan to address potential community concerns about increased traffic congestion and related environmental impacts, particularly in the context of the project's consistency with local and regional transportation plans?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Larissa Dobrzhinetskaya 19148 Vintage Woods Drive, Riverside, CA 92508 Mission Grove Neighborhood Alliance Sent from my iPhone

**Sent:** Sunday, June 23, 2024 9:30 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

**Section 5.17.5** 

Parking - Unbundle Residential Parking Costs from Property Cost. According to CAPCOA, increasing the cost of owning a vehicle will decrease or discourage vehicle ownership and therefore reduce VMT and GHG. CAPCOA transportation Measure T-16, Unbundle Residential Parking Costs from Property Cost, was used to estimate the amount of VMT reduction that can be achieved by charging for additional parking stalls. The Project proposes to provide 1 parking stall to every apartment unit within the rental unit fee (no additional charge) and charge \$75 per month for any and each additional parking spaces, which may reduce Project VMT by up to 3.9%.

- This section appears to be in violation of AB 1317 signed into law in 2023 and effective in January 2025 with any new certificate of occupancy, requires that all parking be unbundled and charged for separately. With this project being in the middle of a shopping center, not providing enough parking for the number of units, and the tenants being able to opt out of paying for parking since the shopping center parking is free, creates numerous issues for the retail establishments and their customers. This is especially true since occupancy standards allow for up to 6 people in a one bedroom. None of this has been addressed in this report.
- How do you plan to comply with AB 1317, which requires all parking to be unbundled and charged for separately starting in January 2025, given that your current proposal includes one parking stall per apartment unit within the rental fee?
- What specific measures will be implemented to prevent tenants from opting out of paying for parking and instead using the free parking available in the shopping center, potentially causing parking shortages for retail customers?
- Can you provide a detailed analysis of the potential impacts on retail establishments and their customers if tenants use the shopping center parking, including any mitigation strategies to address these issues?
- How do you plan to address the potential for high occupancy rates (up to 6 people in a one-bedroom unit) and the resulting increased demand for parking, which may exceed the provided parking capacity?
- Have you conducted any studies or assessments to evaluate the effectiveness of unbundling residential parking costs in reducing VMT and GHG emissions, and how do these findings support the proposed parking strategy for this project?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Larissa Dobrzhinetskaya 19148 Vintage Woods Drive, Riverside, 92508 Mission Grove Neighborhood Alliance

Sent from my iPhone

**Sent:** Sunday, June 23, 2024 9:28 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

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More specifically, I would like to comment on the following sections related to the EIR: Section 5.11.6

Threshold B: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? City of Riverside General Plan 2025, Consistency with General Plan Policies

- There is no justification for abandoning the General Plan, Specific Plan, Zoning, and other regulations.
- Can you provide a detailed analysis of how the proposed project aligns with or deviates from specific policies in the City of Riverside General Plan 2025, particularly those related to land use and environmental protection?
- What compelling reasons or changed circumstances justify abandoning the existing General Plan, Specific Plan, and zoning regulations for this particular site?
- Have you conducted any studies or assessments to evaluate the potential long-term impacts of deviating from established land use plans and policies on the surrounding community and environment?
- How does the proposed project address the purpose of "avoiding or mitigating an environmental effect" as mentioned in Threshold B, given that it appears to conflict with existing land use plans?
- Can you provide examples of similar projects in Riverside or comparable cities where significant deviations from established land use plans were approved, and what were the outcomes and lessons learned from those cases?

# Summary

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Thank you for your consideration of this letter.

Sincerely,

Larissa Dobrzhinetskaya 19148 Vintage Woods Drive, Riverside, CA92508 Mission Grove Neighborhood Alliance

Sent from my iPhone

**Sent:** Sunday, June 23, 2024 9:26 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

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More specifically, I would like to comment on the following sections related to the EIR: Section 5.1.1

Aesthetics-Setting: Although the majority of the City is urbanized

- This is not true and no evidence has been provided to support this statement.
- Can you provide specific data or studies that support the claim that the majority of the City is urbanized? What metrics or criteria were used to make this determination?
- How do you define "urbanized" in the context of this project, and what percentage of the City meets this definition according to your analysis?
- Have you conducted a comprehensive land use survey of the City to verify the extent of urbanization? If so, can you share the methodology and results?
- How does the level of urbanization in the immediate project area compare to other parts of the City, and how might this impact the project's compatibility with its surroundings?
- Given that the statement about urbanization has been challenged, how does this affect your overall assessment of the project's aesthetic impacts, particularly in terms of its compatibility with the existing visual character of the area?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Larissa Dobrzhinetskaya 19148 Vintage Woods Drive, Riverside, 92508 Mission Grove Neighborhood Alliance

Sent from my iPhone

**Sent:** Sunday, June 23, 2024 9:25 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units.

- The ALUC will allow higher density than 6 du/ac. The surrounding area shows densities as high as 16 du/ac. A 16du/ac with retail on the bottom floor would be more compatible with the area. Especially if the unit mix concentrated on 2 and 3 bedroom.
- Given that the surrounding area shows densities up to 16 dwelling units per acre, why have you chosen a significantly lower density of 58 units for Alternative 2, rather than exploring a middle ground that could better align with the neighborhood character?
- Have you conducted any studies to determine how a mixed-use development with retail on the ground floor and residential units above (at 16 du/ac) would impact local economic vitality and housing affordability compared to your current proposal?
- Can you provide a comparative analysis of the environmental impacts, particularly regarding traffic and infrastructure demands, between your proposed 347-unit development and a potential 16 du/ac mixed-use alternative?
- How would focusing on two and 3-bedroom units in a higher-density scenario affect the project's ability to meet local housing needs, especially for families, compared to your current unit mix?
- Considering that the Airport Land Use Commission (ALUC) allows for higher density than six du/ac, what factors led to the decision to propose such a low-density alternative, and how does this align with broader city planning goals for efficient land use and housing provision?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Larissa Dobrzhinetskaya 19148 Vintage Woods Drive, Riverside Mission Grove Neighborhood Alliance Sent from my iPhone

**Sent:** Sunday, June 23, 2024 9:21 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Larissa Dobrzhinetskaya 19148 Vintage Woods Drive, Riverside, CA 92508 Mission Grove Neighborhood Alliance Sent from my iPhone

From: Larissa Dobrzhinetskaya <larissa@ucr.edu>

**Sent:** Sunday, June 23, 2024 9:36 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 6.2

ALUC: Project would result in a significant and unavoidable impact. Although implementation of the recommended conditions identified in the Riverside County Airport Land Use Commission (ALUC) Staff Report for the Project would not render the Project consistent with the MARB/IPA LUCP Compatibility Zone C2 density compatibility criteria, they would be implemented, in order to reduce the potential hazards from flight accidents to the greatest extent feasible.

- Rejected by ALUC for residential density issues.
- Given that the ALUC has rejected the project due to residential density issues and determined it would result in a significant and unavoidable impact, what specific justifications can you provide for proceeding with the project as proposed?
- Can you provide a detailed analysis of how the recommended conditions from the ALUC Staff Report would mitigate potential hazards, despite not fully resolving the density compatibility issues?
- Have you explored any alternative designs or configurations that would bring the project into compliance with the MARB/IPA LUCP Compatibility Zone C2 density criteria, and if so, why were these alternatives not pursued?
- What specific measures beyond the ALUC's recommended conditions do you propose to further reduce potential flight accident hazards and address safety concerns?
- How do you plan to address potential legal and liability issues that may arise from developing a project that has been deemed inconsistent with airport land use compatibility criteria by the responsible agency?

# Summary

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Thank you for your consideration of this letter.

Sincerely,

Larissa Dobrzhinetska 19148 Vintage Woods Drive, Riverside 92508 Mission Grove Neighborhood Alliance Sent from my iPhone

From: Larry lest <iestlarry@gmail.com>
Sent: Monday, June 24, 2024 7:01 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 5.1.5

Threshold C: In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

- This will be a huge build protruding into the commercial space creating an unsightly view and disrupting the continuity of the area. It will be an eyesore and no evidence has been provided that reflects anything different.
- Can you provide visual simulations or renderings of the proposed project from various publicly accessible vantage points to demonstrate how it will impact the existing visual character and quality of the site and its surroundings?
- How does the proposed project comply with applicable zoning and other regulations governing scenic quality in the area, and what specific design elements have been incorporated to minimize visual disruption?
- What measures will be taken to ensure that the project does not create an unsightly view or disrupt the continuity of the commercial space, and how will these measures be enforced?
- Have you conducted any community consultations or surveys to gather feedback on the visual impact of the proposed project, and if so, what were the findings and how have they been addressed in the project design?
- Can you provide examples of similar projects where large builds have been successfully integrated into commercial spaces without degrading the visual character or quality, and what lessons from those projects will be applied to this development?

#### Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your	consideration	of this	letter.

Larry lest

Sincerely,

8149 Faircrest Rd, Riverside, CA 92508 Mission Grove Neighborhood Alliance From: L S <nichole19161@gmail.com>
Sent: Monday, June 24, 2024 11:23 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Mission Grove Apartments PR-2022-001359 Draft EIR Comments

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Mission Grove Apartments PR-2022-001359, State Clearinghouse

No.2022100610 EIR Draft EIR Comments

I am a concerned Mission Grove resident who lives in a single family home community, Creekside HOA, that is directly behind this proposed project off of Mission Village Drive. I am opposed to this project as it is currently proposed for a density of 35 dwellings per acre, as it will increase noise, air quality, greenhouse gases, strain on our limited services in the community and most concerning is it will greatly increase traffic throughout the community of Mission Grove and Orangecrest, communities that are already burdened with heavy traffic on our few roads in and out of the area. I have reviewed the DEIR and have several comments, concerns and questions I would like to bring to your attention.

- 1. **Section 2, P 2.0-6 through 2.0-9:** The header states "Crestview Apartments Project DEIR", not Mission Grove Apartments DEIR.
- 2. Section 6.0, P 6.0-1: Environmental is misspelled.
- 3. There is no mention of the relocation of the Sunset Recycling Center that is currently located on the project site. It is very important to have a location to be able to recycle and the city is already lacking in providing this service. I would like to see that recycling center saved and relocated to another location in that shopping center. If you want this proposed project to be environmentally friendly in all aspects, you should promote a recycling center that will also benefit your renters and encourage them to recycle.
- 4. **Section 5.15, P. 5.15-5:** Under **PS-8.5,** Crime Free Multi Housing Program is referenced as a way to reduce crime in apartment communities. Riverside City Council voted to end this program in September 2023 and all references need to be removed from this DEIR.
- 5. **Appendix B, P.22:** States the construction will last until 2027, but in Section 5.3, P. 5.3-20, it states it will be opening in 2028. **Appendix I, 1-1** states the opening is 2027. There were other areas throughout the DEIR and appendices where it toggled

- back on the construction completion being 2027 and 2028. What year is it anticipating being complete? I live in a single family home community that is 115 ft from this proposed project and this construction is going to greatly affect our quality of life. We need to know. Please decide which year it is going to be and make it consistent through all documents.
- 6. **Section 5.1, Figure 5.1-8:** Lighting plan. Single family residences are less than 115 ft from the project entrance on Mission Village Drive. The lighting plan shows multiple varieties of lighting fixtures that will be visible from the backyards of the single family residences in the Creekside HOA community. How bright will these various lights be? What type of study was done to ensure these various lighting fixtures (bollard, theme pole light, wall mounted light, overhead festival lighting, etc) will not cause light pollution issues for the single family home residents on Mission Village Drive. Light pollution can have negative effects on humans, wildlife and the environment such as disrupting human sleep and creating increases in carbon dioxide in the atmosphere, among other things.

  (https://education.nationalgeographic.org/resource/light-pollution/). On page 5.1-
  - 22, it states that the project is located in a CR commercial zone, lighting zone
    3. This project is not going to be zoned as commercial. Does Mixed use-urban zoning have the same lighting zone as commercial?
- 7. Section 4.3, P 4.0-1: Since much of this DEIR is stale and mostly written off of information from two years ago in 2022, there are additional projects in various phases in the area that should also be accounted for in regards to the "cumulative impacts" that are going to impact our community. This DEIR used a Focused Traffic Analysis (TA) from 2022 (in Appendix I.) In reviewing Riversides Planning Dept. online current map for citywide cumulative projects, there are new proposed projects as well as some already in construction that will contribute to environmental concerns with greenhouse gases, noise and traffic delays. In the same shopping center, a few doors down from this proposed project, there is an empty retail building that is slated to be a gym. Nowhere in this DEIR is that project taken into account. Adding a gym is going to add to the VMT in the surrounding area, resulting in more noise, more traffic, more pollution and more unsatisfactory LOS on surrounding streets already being burdened. Right across the street in Mission Village Shopping center, approx. .3 miles away, there is a proposal for construction of two commercial buildings totaling 24,700 sf. In that same center, there is a proposal to renovate and expand the existing Arco gas station, their car wash as well as add a 2,220 sf fast food restaurant. Also in that same center is a new 3,500 sf Panera Bread restaurant and drive thru currently under construction. There are also at least three proposed projects on Van Buren Blvd. that are approx. 2.2-3.7 miles away: A 4.319 sf Panera Bread Restaurant and drive thru, a 74 unit multi family residential development, a 4,300 sf Denny's restaurant and a 9,920 office building, a 69,316 sf expansion of Woodcrest Christian School which will increase their student count from 720 students to 1,000, and a 24 unit 21,723 sf multi family residential development. These projects off of Van Buren Blvd. should be added because Van Buren is heavily traveled by residents in Mission

Grove, to include the 850+ residents that will be in this proposed apartment. I've lived directly across the street from this proposed project site for 28 years, and I use Van Buren all the time to get to and from destinations. Traffic is LOS F. Lastly, March Joint Powers Authority has a proposed Gateway Aviation Center project which, according to its DEIR, will cause significant air emissions, noise and traffic (VMT). All these projects need to be added into this DEIR for it to be realistic. If you review **Appendix I, Section 1.1**, you will see that the streets surrounding these nearby proposed and in construction projects, are already operating at an unsatisfactory level of service (LOS) even before adding this proposed project. Since this DEIR did not take into account these projects in the immediate vicinity in regards to the LOS, how can you say adding your project will only keep these streets at an unsatisfactory level as opposed to moving to an operational deficiency LOS F, which would require mitigation. The TA used is clearly not accurate to where the streets LOS will be if this project moves forward and opens in 2028, as there are many projects that have been built since the 2022 TA, as well as projects in construction now or in construction at the same time as this proposed project.

- 8. **Section 5.11:** Throughout this section, the DEIR refers to the City of Riverside General Plan (GP) 2025. This plan is outdated, as it was written in 2007. There was a GP phase one update in 2021, but GP phase two is not available yet. Did this DEIR refer to only the GP 2007 or did they also utilize the 2021 update, which was not mentioned in the **section 5.9.11** References?
- 9. Section 5.11 (5.11.1): It is stated that Mixed Use-Urban (MU-U) zoning is the requested zoning for this project, but yet this strictly multi family residential (no leasable commercial space) project does not fit the City of Riverside site development standards for MU-U (see https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/202 2/2022-02%20Commercial-MU%20Zones%20Handout.pdf.), showing that mixed use has to be 50/50 mixed use. Being that this project has no commercial or retail being built on the first floor, It seems that this proposed project should not be zoned as MU-U, rather an R3 or R4 Multi Family Residential development according to Riverside's site development standards. When the NOP was done, Anton Development was leading this project. Not until recently, it was given back to the owner of the Mission Grove Shopping Center, Michelle Rubin. With her taking this project back (although I'm sure Anton is still waiting in the wings to resume sale and development), can she have it rezoned to MU-U just because she owns the whole shopping center, therefore fulfilling the 50/50 city requirement of mixed use? If this project is approved as a MU-U property, can she then turn around and separate that parcel and sell to a developer, leaving this parcel to be strictly residential because they do not own any of the commercial retail in their parcel? It is very suspicious how the project was reverted back to Rubin.
- 10. **Section 5.9, ( P. 5.9-14):** The inconsistency with the Airport Land Use Commission (ALUC) is not to be taken lightly. ALUC clearly stated in their decision that this proposed project's density is just too high to overlook and as it is proposed

will cause a significant environmental impact due to not abiding by the land use plan, policy and regulations, which are adopted for the purpose of avoiding or mitigating detrimental environmental effects. County Wide policy 3.3.1 allows some leeway for greater density in zone C2, up to 12du/ac. This seems like a reasonable compromise to the ALUC density standard. Using the non residential average intensity to craft the results in your favor is wrong. How do you justify using just the common areas (pool, club leasing office, etc) as a compatible means of true density when that completely overlooks the 850+ residents in their 347 apartments? Additionally, using the parking space density method is also deceitful when it is for a residential project. This zone C2 residential density standard should be treated and calculated in that manner, which is 6du-ac. The Mission Park Apartments down the street are over 6du/ac also, but they are a reasonable 16du/ac. That is a good compromise and that is what this project should strive to do as well. Lastly, it should be noted that if you read the ALUC transcript from the day they rejected this project, they also brought up concerns over the traffic generated from a 35du/ac project by noting the unsatisfactory LOS in the surrounding area of Alessandro and the 215 freeway. As ALUC is aware, the cumulative additional traffic from this project and all the other surrounding projects is concerning for the ALUC. If there is an emergency and MARB needs to be activated, the surrounding traffic from all these projects is going to be a safety issue for the base.

11. **Section 5.11, P. 5.11-32 & 33, Section 2.3:** THE GP 2025 objective and policy states to encourage community collaboration in development decisions. The DEIR states that the project design team reached out extensively to the residential community. They had two meetings in the community and sent out one small 5" x 8.5" notice that was designed to deceive by looking like an ad for "Riverside's Newest Residential Opportunity!", with its luxurious pool and spa, etc and calling it an open house. It would be hard for most residents to deifer that this is an "outreach" meeting to let us know the process, Additionally, the developer did not initiate the meeting with the Mission Grove Neighborhood Alliance. What is the definition of "extensive community outreach?" I attended both meetings and I did not see any effort to have community collaboration in development decisions. In Section 2.3, it is mentioned only one response was received to the NOP that was put out in October 2022. How were affected and interested parties notified that this NOP was put out? I live within the affected community that is only 115 ft away from this proposed project and we received no notification of the NOP being available. How is this transparent? Clearly it was swept under the rug. Section 2.3 states the city held a virtual EIR public scoping meeting in November 2022. Where did they provide public notice of this meeting? They claim it to provide information to residents/community members, yet we were excluded from receiving proper notice. It appears to be in violation of CEQA guidelines. The community does not want a project of this height and density. We would like to have a voice, as recommended in the GP 2025. NO transparency is happening with the city in this environment procedure.

- 12. **Section 5.3, (5.2.3.4):** Once again, the GP 2025 is referenced for its air quality element. That element can not be counted as reliable in 2024, as it has not been updated since 2007. We have so much more pollution, traffic and noise due to extreme growth, particularly with multiple warehouses built in the proposed project area, resulting in an abundance of trucks on the road contributing to greenhouse gases among other pollutants. The information in the GP 2025 does not reflect current area conditions.
- 13. **Section 5.3 (5.3.5)**: In regards to fugitive dust, on **page 5.3-21**, it states that watering the site is to be done at least <u>two</u> times a day, but on **page 5.3.29 (BACM AQ-1)** states the project should be watered <u>three</u> times a day. **Appendix B, P.23** states that active site should be watered at least <u>two</u> times a day. Please decide if it is a minimum of two or three times a day to water the site and make it consistent throughout the DEIR and appendix.
- 14. **Section 5.3, P. 5.3-27:** DEIR states that this project is anticipated to be short term (1- 2 yrs) and therefore not subject to long term DPM emissions. Stating the project is only 1-2 yrs is inaccurate. Multiple areas in the DEIR and Appendices conflict when stating how long the construction will be. There is a statement that the project is 28 months, which is 2 yrs 4 months, not 1-2 years as stated on P 5.3-27. Additionally, there are numerous times it states the construction is complete in 2027 and other pages state 2028. What is correct? Please be consistent throughout your documents.
- 15. **Section 5.9, P. 5.9.19:** The proposed project will have 40.000 sf of solar panels on the roofs and on the carports. The DEIR only analyzes the effects of the solar panels in regards to airplanes. There is a sensitive receptor within 115 feet, the single family homes in the Creekside HOA off of Mission Village Drive. There is a whole street of homes whose backyard and windows face the project. Will there be issues with glare for the single family homes? Do you do any studies on solar panels how it can affect nearby homes for issues such as glare, flash or glint? Solar panels are also mentioned in **Section 5.11, P. 5.11-56**, once again not mentioning any glare effects on the residential homes 115 sf away.
- 16. **Section 5.15 (5.5.6):** Both fire stations that are referenced in this DEIR are fairly small, only four firefighters per station. Has this project been discussed with the Riverside Fire Department to confirm if they have adequate resources for the high density apartment project. I am concerned because these two stations are not used to taking calls from four story apartment buildings, whether it be fighting a fire or for medical aid. I spoke with a fire captain who has over 25 years of experience in urban settings and he does not think these two stations are adequately prepared to fight a fire at this four story five building project. The buildings our firefighters are used to are two story buildings, single family homes and light commercial/retail. Two story apartment fires will be a 1-2 alarm fire, which is about 4-5 engines, 3-4 truck(ladder) companies. A four story complex is going to take double the amount of resources. Our two stations nearby would NOT be adequate in this situation and would need the help from stations further out, which would result in a longer wait time to save life, property and environment. I'm very

- concerned about their ability to adequately fight the fire in a timely manner, especially since my single family home community is just 115 ft away from this proposed project. About 90% of calls dispatched to the fire dept. are for medical. The DEIR states that fire station #11 can get there in three minutes (unlikely with our unsatisfactory LOS on all streets in the area), but did you account for the time to get into the project as well as them having to figure out what building and unit the call originated from? That adds critical minutes to them reaching a person who may be in medical distress. It only takes between 4-5 minutes for heart & brain death to occur without CPR. Then after getting the patient, you have to get them to an ambulance. What are the dimensions of the elevators? Are they big enough to handle multiple firefighters with their gear, paramedics with their gear and a gurney? If this proposed project is approved, I recommend the local fire departments are instructed to familiarize themselves with the layout of the complex so they aren't going in blindly when they get calls for service. Is there any documentation from Riverside Fire that they are adequately trained and can deal with fire calls for a five building, four story too high density apartment complex fire?
- 17. Section 5.11, P. 5.11-25: The GP 2025 (2007) states the development will ensure there is adequate parking provided. While the 513 parking spaces provided may sound adequate, it simply is not for a project with this high density. Several of the parking spots are tandem, which renders them unusable to many. Several are for EV charging, which I believe are also to be used by non residents. Table 3.0-4 shows one bedroom units are allowed 1.5 parking spots. What is your definition of a .5 parking spot? How is it determined what one bedroom renter gets the parking spots, as there clearly won't be enough for all the one bedroom units. It appears that many of the parking spaces are outside of the gated complex. Is that the 91 shared spaces? It is first come first serve? Is there not a dedicated spot for apartment guests to park? With the anticipated EOS gym being constructed in that center, there are going to be serious issues with parking for the residents that are there to use the Mission Grove Shopping centers various businesses. These businesses, such as the gym, Stater Bros, nail shop, Cookie shop, etc are guaranteed to lose customers due to the lack of parking available because it is going to be overtaken by the apartment renters and their guests. At peak times every day, it can be hard even now to find parking for Stater Brothers. Were the existing shopping center anchor tenants even consulted on the parking issues this proposed project is going to cause? I am concerned with residents and their guests parking on Mission Village Drive. Parking is only allowed on one side of that street and the residents of my community (Creekside HOA) need those spaces to be available for street sweeping days as well as when we have our streets slurry coated. If this project goes through as is, this development will not be a good neighbor to our community. We will have to go to the city and ask that streets be restricted for single family home use and issue us permits, put up additional signs regarding parking permits and then we'd need some code enforcement for it. Who is going to pay for that? The city and us taxpayers will have to pay for it when it should be an issue addressed by this DEIR and paid for by the developer.

- 18. Appendix I, 2.4- VMT Reduction Measures: This section suggests unbundling residential parking cost from the property costs by giving all apartments one parking spot but charging an additional \$75 to only studio and one bedroom renters if they want an additional spot. That statement does not make sense. On one hand you are saying ALL apartments (studio, one bedroom, one bedroom +den, two bedroom and 3 bedroom) are given one spot, so are you not charging the bigger apartments for their second spot? Are you saying the larger apartments are still getting their two spots for free? California has passed AB 1317, which states all parking spots must be paid for and separately from the rent. This is to go into effect in January of 2025, so this proposed project is subject to the requirements of this new bill, and this is not reflected as such in this DEIR or its Appendices. I am under the impression from this new bill that you must charge for all 513 parking spots. How would you charge for the 58 tandem spots? Are there really only 29 tandem spots but since they fit two cars, you are technically counting them as two spots? Those spots aren't practical, especially if they have to be rented and shared by two different apartments. Regarding the garages, is there access to any apartments from within any of those 182 garages, therefore exempting them from the bill? Realistically, charging people for parking spots is doing nothing to reduce VMT in an area that does not have access to many amenities, jobs or public transit. Everyone who rents at this proposed project and pays high dollars for rent, is going to have 1+ vehicles guaranteed. Charging for parking spots is only going to make the car owners seek out the free parking in the commercial/retail areas as well as parking on Mission Village Drive. This is going to cause hardships for the surrounding community residents and limit our parking options because we have to drive to these services since this community is limited in services. This is going to result in the existing businesses losing customers. I've been to community meetings and residents are already saying they will go elsewhere. I'm sure Michelle Rubin doesn't want her tenants to lose business. Bottom line is that none of the VMT reduction measures listed are going to do enough to reduce the impact to less than significant level, and the proposed project is still going to have a significant transportation impact under CEQA. That is not okay.
- 19. **Appendix E:** It is stated that there are zones of hard bedrock at depths requiring heavy ripping, use of breakers or "other" industry standards since blasting can not be used due to a sensitive receptor 115 ft away (single family homes). What is considered "other" industry standards that are used in place of blasting near sensitive receptors? What will the dBA be for these other means of breaking up bedrock? If you are going to use equipment that is going to to break up hard bedrock, I am assuming that there will be extra disruptive noise, worse air quality and disruption to the sensitive receptor area (single family homes 115 ft away), be a good neighbor and please provide advance notification so residents can plan accordingly, This geotechnical report was written in June 2022, and it state that it should NOT be relied upon after three years. This report is now over two years old. If this proposed project is still going to the approval processes with the City, will you be conducting another updated geotechnical report?

- 20. Appendix H/ DEIR 5.13: GP2025 Objective N-2/N-3 is to minimize the effects of airport related noise through proper land use planning. This project is in violation of proper land use planning according to GP 2025 and the ALUC standards. Why aren't you taking any steps to try to compromise with the ALUC if you are so concerned with helping provide housing for the RHNA? In listening to the ALUC meeting, some commissioners were willing to double the density allocation per acre from 6du/ac to 12du/ac. In fact, the Mission Park apartments down the street were approved and constructed at 16du/ac.
- 21. Appendix H, Table W: HVAC noise levels are concerning for the residential community across the street. The appendix states the city code noise requirement from 10pm-7am is 50dBA, but in looking at table W, some areas are in violation and the residential dBA is almost at 50, after giving a 5 dBA so called "shielding reduction." What study did you use to determine the reduction with the "shielding"? The HVAC system noise for 345 units running possibly 24 hours a day, is going to be a noise issue for the sensitive receptor (single family homes) across the street. The DEIR Section 5.13 states that the city's noise control section (title 7) states the exterior noise standard in residential at night is 45 dBA, which contradicts what is stated in the Appendix H. Which is correct?
- 22. **Section 5.15: Public facilities** There are no public facilities such as libraries, universities or community colleges within walking distance. You claim this high density project is all about reducing VMT, but there are no real services, good paying jobs, schools, parks or public facilities within walking distance. Your traffic analysis does not take into account any of these issues. Where can you show us the real effects of 1,000+ apartment renters moving into the area? Where are you showing the VMT for all the trips to take the kids to school in the morning and picking them up in the afternoon? That will add hundreds more trips just from that apartment complex. Our streets can't handle it when they are already at LOS of D, E and F AND your DEIR states that some of these locations have no mitigation options. How are we supposed to get around when our streets are gridlocked? How will fire/PD get to calls when we are gridlocked? Things like that are not being accounted for in this DEIR, therefore this DEIR is faulty and not a true representation of the unsatisfactory LOS of the streets that are going to happen if this project is approved as shown in the DEIR.
- 23. **Section 5.14.6 DEIR & Appendix I:** The way you determined the total number of people (829) living in the 347 apartments is flawed. A more appropriate measure that should be used to determine the approximate population amount in this project is the census for Riverside for 2018-2022 (https://www.census.gov/quickfacts/fact/table/riversidecitycalifornia/POP010220), which states Riverside has an average of 3.32 persons per household. In using a non-biased resource, that equates to approximately 1,152.04 residents in the apartment complex (347x3.32). Clearly this is very different from 829 stated in the DEIR, resulting in more cars, more need for a variety of services, schools, medical services and more importantly, way more vehicles on the road adding to greenhouse gases, noise, energy use, etc. A new study should be done based off

the population numbers provided in the census. Even Western Municipal Water District based their indoor water allocation default of three persons per household off census data (https://www.westernwaterca.gov/335/Residential-Water-Budgets). Additionally, California Department of Fair Employment and Housing (DFEH) uses the "two plus one" formula, which permits two people to occupy each bedroom, with one additional person in the living spaces. Do the math for the potential capacity of the 347 apartments proposed using DFEH occupancy standards. There would be 1,621 residents that could potentially be allowed to occupy this project. That amount is almost double what you based your DEIR on and it would substantially change the DEIR categories. Why didn't you include these numbers in your study as well as a comparison that is possible according to the law?

- 24. Section 5.16.2.3 & 5.16.4: The Riverside, Park, Recreation and Community Service plan states that a neighborhood park should be located within 0.5 miles of every residence in the city. The nearest park, Taft, is over a mile away. Do multi use urban or multi family apartments have to abide by that plan as well? How do you get away with not having any park space within 0.5 miles? That being said, this will result in many more apartment residents getting in their cars to go to the parks that are miles away from this proposed site. The DEIR traffic analysis did not take this into account in any of their studies. Parks use is vital, especially for kids and I am sure there will be many children in the proposed apartment complex that will be going to the surrounding communities parks. How can you justify your Specific Plan Amendment proposal reducing the common usable open space per unit requirement in half? You are already grossly exceeding the density rules and now you want accommodations to grossly reduce this rule as well? If so many exceptions are needed for this project, it is a good sign this project is flawed as currently presented in this DEIR and is not an acceptable use for this space and community. The residents already don't have access to a park within .5 miles and now they will have less outdoor space in their complex. Do you not surmise that this will drive the residents to get in their cars to drive elsewhere where they can enjoy actual open space, resulting in more VMT?
- 25. **Appendix H, Table H,I, J, K:** These tables for short term and long term noise level measurements are not a true representation of the noise level for that area. The long term measurements were started on a Sunday and only went until noon on a Monday. That is flawed and does not accurately reflect the higher levels of noise happening in the project area Monday through Friday. Why would you use a Sunday as the test date when you know there is less traffic and other noises that day, resulting in inaccurate information?
- 26. **Section 5.9, P. 5.9-19:** The DEIR states ample open space is provided adjacent to the project in the event an aircraft requires an emergency landing. Who determined this to be so? Can you provide the research on what airplanes fly out of March Air Force Base and their dimensions? Once the project is built out and the EOS gym also built in the same center, do you think there will be open parking spaces where

- a large airplane can safely land? Show the research. There will be no room and the parking will be all used if this project is built as proposed in this DEIR.
- 27. Section 5.6.2.4, P 5.6-11: The DEIR used Riverside Public Utilities (RPU) 2018 Integrated Resource Plan (IRP) as the guide for assessing the availability of electricity to the project. RPU came out with a new IRP in 2023. Section 5.6.5 (P. 5.6-16), states the project is consistent with the 2018 IRP goals. Since the 2018 IRP was written, significant legislation and regulations have occurred that have a potentially significant impact on both RPU and its customers, therefore the 2018 IRP should not be used to assess RPU's energy capabilities in relation to providing adequate service to this project and the city as a whole. The EIR needs to use the current IRP (https://online.fliphtml5.com/ltghc/qrro/#p=1).
- 28. Appendix I & DEIR Section 5.17: The project design will not be effective in alleviating circulation/queuing issues or VMT. The DEIR projection of 829 residents is on the very low side and based on a less accurate and biased source, the city. With that amount being incorrect, how can you surmise there will only be 1,464 vehicles a day going in and out of the project? Appendix I notes in general that the study should not exceed a five mile radius unless there is evidence to justify a larger area, THis project LOS and VMT assessments failed to take in a larger radius when it is needed to clearly reflect where the new tenants will need to drive. I consider myself an expert when it comes to driving the streets of Mission Grove and Orangecrest after living here for almost 28 years. This LOS/VMT analysis failed to account for where the apartment residents will be going, to include taking kids to school or daycare, going to the park, going to medical facilities, going to college, going to work. This project is trying to be represented as a live, work, shop type of place but we all know this is not the case. The Mission Grove area is more suburban than urban. The shopping centers are run down and have vacancies. There are not enough good businesses or services within walking distance in Mission Grove. While I may walk from my house, which is right next to this proposed project, to get a coffee or lottery ticket, I still need to drive to get groceries. I can't possibly carry all the grocery bags home without having a car. There are not enough dining or entertainment in the shopping center to keep residents out of their cars. The study area needed to include the streets that lead to all the schools in Mission Grove and Orangecrest, as school traffic adds a large amount of traffic. Why did you not do a study that included the routes to schools, to include Wood Road and further down Trautwein? There will be many kids in this project if approved. If I see that it is school time, I avoid all those streets because it is LOS F. This DEIR states that the traffic from when the Kmart was open, created more traffic than these apartments will. Where do you have the documentation to prove that? That can not be true. Additionally there have been so many projects built in the last few years that have increased traffic exponentially more than what your old studies show. Did you do any studies that reflect the traffic issues that are going to transpire due to two of the Mission Grove Shopping Center losing two of the entrances and exits, Plaza Driveway two and driveway three? By taking away those two ways for retail customers to access the shopping center, it is going to create

heavier traffic at the few entrances left, which are off busy Alessandro and off of Mission Village by Trautwein. Your project will add VMT because customers are going to have to travel further to find an entrance. Both entrance streets already operate at an unsatisfactory LOS. Was there any study done on adding a left and right turn lane on a two lane road, as is wanting to be done on Mission Village Drive? How many accidents occur as a result of someone trying to turn left and another trying to turn right and hitting one another? Cars are allowed to park on the one side of Mission Village Drive by Bayou. Will adding the left and right center turn lanes by the proposed project driveway 3 and the existing driveway going into the single family homes, leave enough room for cars to be parked there and cars to travel in the lane? Your project trip generation determination is flawed and clearly does not account for the realistic daily life of a person who lives in this area. There is no way that the net trip for the project is only 1,464 daily. I do not see you taking into account people going to work, going to school, going to recreation, going to real shopping centers and other errands, apartment workers, landscapers, maintenance workers, pool service, guests, etc. Your traffic analysis does not take into account the many newer projects that are in the works and that will also add hundreds of more vehicles in the area. The effects of VMT have not sufficiently been analyzed in this DEIR.

I have been a homeowner in this community and I am very passionate about keeping this a suburban liveable community for those who have invested in living here. This project as proposed does not align with Mission Grove. This project's density is too large by ALUC standards and also too large for the community. There are not enough services here, whether it's retail, work, entertainment, recreation, etc. The small retail center this project is to be built in does not have enough to keep people out of their cars, resulting in the project creating significant impacts. The DEIR proves this project size is not the right fit. There are other alternatives that would benefit the community better as well as satisfying some of the city's housing goals, at lower density of course. Go back to the drawing board.

I would like to request a written response to my comments prior to the certification of the final EIR and be placed on a mailing list to receive notifications of future public meetings for this project. Thank you.

Laura Sandidge 19161 Vintage Woods Drive Riverside Ca 92508 nichole19161@gmail.com

From: L S <nichole19161@gmail.com>
Sent: Monday, June 24, 2024 5:00 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments DEIR, SCH # 2022100610

As a Mission Grove homeowner for 28 years, I have many concerns over the proposed apartment project in my community. A DEIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. I had sent a previous email addressing a variety of issues and I am adding this email to address the alternatives.

The proposed project is inconsistent in multiple ways: The City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the DEIR:

Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units.

- The ALUC will allow higher density than 6 du/ac. The surrounding area shows densities as high as 16 du/ac (Mission Grove Park Apartments). A 16du/ac with retail on the bottom floor would be more compatible with the area, especially if the unit mix concentrated on 2 and 3 bedroom apartments that are in higher demand.
- Given that the surrounding area shows densities up to 16 dwelling units per acre, why have you chosen a significantly lower density of 58 units for Alternative 2, rather than exploring a middle ground that could better align with the neighborhood character? It would be reasonable to calculate the dentsity at 16du/ac and get 144 units for alternative 2, which would align better with the suburban community of Mission Grove.
- Have you conducted any studies to determine how a mixed-use development with retail on the ground floor and residential units above (at 16 du/ac) would impact local economic vitality and housing affordability compared to your current proposal?
- Can you provide a comparative analysis of the environmental impacts, particularly regarding traffic and infrastructure demands, between your proposed 347-unit development and a potential 16 du/ac mixed-use alternative?
- How would focusing on two and 3-bedroom units in a higher-density scenario affect the project's ability to meet local housing needs, especially for families, compared to your current unit mix?
- Considering that the Airport Land Use Commission (ALUC) is open to small density allowances higher than six du/ac, what factors led to the decision to propose such a low-density alternative, and how does this align with broader city planning goals for efficient land use and housing provision?

### Alternative 7.0.5- Retail Development

- Clearly there was no effort into making this option viable in the DEIR. Why would you only give the option for "minor" improvements for inside the building? There are alot of possibilities and improvements that can be made to that existing space.
- This alternative would provide resources such as possible entertainment, retail or restaurants that will benefit the whole Mission Grove community.

#### Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you.

# Sincerely,

Laura Sandidge 19161 Vintage Woods Drive 92508 Mission Grove Neighborhood Alliance From: Lauren McGinley <lemblue2@yahoo.com>

**Sent:** Sunday, June 23, 2024 4:44 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

**Section 5.17.5** 

Parking - Unbundle Residential Parking Costs from Property Cost. According to CAPCOA, increasing the cost of owning a vehicle will decrease or discourage vehicle ownership and therefore reduce VMT and GHG. CAPCOA transportation Measure T-16, Unbundle Residential Parking Costs from Property Cost, was used to estimate the amount of VMT reduction that can be achieved by charging for additional parking stalls. The Project proposes to provide 1 parking stall to every apartment unit within the rental unit fee (no additional charge) and charge \$75 per month for any and each additional parking spaces, which may reduce Project VMT by up to 3.9%.

• This section appears to be in violation of AB 1317 signed into law in 2023 and effective in January 2025 with any new certificate of occupancy, requires that all parking be unbundled and charged for separately. With this project being in the middle of a shopping center, not providing enough parking for the number of units, and the tenants being able to opt out of paying for parking since the shopping center parking is free, creates numerous issues for the retail establishments and their customers. This is especially true since occupancy standards allow for up to 6 people in a one bedroom. None of this has been addressed in this report.

\*\*\*\*I have concerns about finding parking when I go to Club Pilates, the UPS store, Stater Brothers, Ohana Sushi and other small merchants. \*\*\*\*\*

- What specific measures will be implemented to prevent tenants from opting out of paying for parking and instead using the free parking available in the shopping center, potentially causing parking shortages for retail customers?
- Can you provide a detailed analysis of the potential impacts on retail establishments and their customers if tenants use the shopping center parking, including any mitigation strategies to address these issues?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Lauren McGinley 276 Cottonwood Avenue Mission Grove Neighborhood Alliance

Sent from my iPhone

From: Lawrence Clark <lawrencerwin@gmail.com>

**Sent:** Sunday, June 23, 2024 9:13 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented unbiased; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)).

- These alternative selections are not market-driven but simply as they relate to the project's significant effects. The city advocates for the project, so they will not be looking for objective and relevant alternatives unless they meet their needs. How did you determine the range of alternatives presented in the EIR, and can you provide evidence that these alternatives genuinely address the project's significant environmental effects?
- Given that the City is described as an advocate for the project, what measures have been taken to ensure an objective evaluation of alternatives that may not align with the City's preferences?
- Can you explain the process used to assess the feasibility of each alternative, particularly those that might substantially lessen environmental impacts but may not fully align with the City's goals?
- How have you incorporated public input, especially from stakeholders who may have differing views from the City, into the selection and evaluation of project alternatives?
- What criteria were used to determine that the presented alternatives would "foster informed decision-making and public participation," and how can you demonstrate that these criteria were applied objectively?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Lawrence Clark M D 1035 Cannon Rd Riverside, CA Mission Grove Neighborhood Alliance From: Lena Johnson <ronlenajohnson@gmail.com>

**Sent:** Monday, June 24, 2024 7:11 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0

The following discussion considers alternatives to implementing the Project and examines the potential environmental impacts resulting from each alternative. By comparing these alternatives to the Project, the relative advantage(s) can be weighed and analyzed.

- These alternatives are not based on any feasibility study, local market analysis, or other independent studies to support the statements or conclusions. Studies have shown that only a tiny percentage of old KMARTS are demolished and replaced with residential housing.
- Can you provide specific feasibility studies or local market analyses supporting the viability of converting this KMART site into residential housing?
- What percentage of similar KMART conversions to residential housing have been successful in comparable markets, and how does this inform your project's potential success?
- Have you conducted any environmental impact assessments to compare the effects of demolition and new construction versus adaptive reuse of the existing KMART structure?
- Given that studies show only a tiny percentage of old KMARTs are demolished for residential use, what unique factors make this site suitable for such a conversion?
- How does your proposed residential development align with the local community's long-term urban planning goals and housing needs, and can you provide data to support this alignment?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Magdalena Johnson 19186 Vintage Woods Dr Mission Grove Neighborhood Alliance Sent from my iPhone

From: Lena Johnson <ronlenajohnson@gmail.com>

**Sent:** Monday, June 24, 2024 9:33 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.2

State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)).

- These alternative selections are not market-driven but simply as they relate to the project's significant effects. The city advocates for the project, so they will not be looking for objective and relevant alternatives unless they meet their needs. How did you determine the range of alternatives presented in the EIR, and can you provide evidence that these alternatives genuinely address the project's significant environmental effects?
- Given that the City is described as an advocate for the project, what measures have been taken to ensure an objective evaluation of alternatives that may not align with the City's preferences?
- Can you explain the process used to assess the feasibility of each alternative, particularly those that might substantially lessen environmental impacts but may not fully align with the City's goals?
- How have you incorporated public input, especially from stakeholders who may have differing views from the City, into the selection and evaluation of project alternatives?
- What criteria were used to determine that the presented alternatives would "foster informed decision-making and public participation," and how can you demonstrate that these criteria were applied objectively?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Magdalena Johnson 19186 Vintage Woods Dr Riverside Ca Mission Grove Neighborhood Alliance

Sent from my iPhone

From: ljmallen@aol.com

**Sent:** Monday, June 24, 2024 3:21 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Fw: Public comment on the record for the Mission Grove

Apartments EIR, SCH # 2022100610

Attachments: EIR Response Apartments 2022100610.pdf

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Comments are below.

I have also attached a PDF version of this email.

Thank You

LJA

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific

Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.9.6

Due to the inconsistency of the maximum residential density, the project would result in a significant and unavoidable impact. There are no feasible mitigation measures that would reduce impacts related to inconsistency with the residential density criteria.

- 1. What specific factors contribute to the inconsistency in maximum residential density?
- 2. Has the project team explored alternative zoning or land use scenarios to address this issue?
- 3. Are there any legal or regulatory implications associated with the inconsistency in density criteria?
- 4. How does the impact of inconsistent density affect neighboring properties or communities?
- 5. Is there a threshold or benchmark for what constitutes "significant" impact in this context?
- 6. Have other similar projects faced similar challenges related to residential density?
- 7. What data or studies were used to determine that no feasible mitigation measures exist?
- 8. Are there any precedents where projects with similar density issues were successfully resolved?
- 9. How does the inconsistency impact the overall project timeline and budget?
- 10. What steps can be taken to minimize the unavoidable impact while adhering to density criteria?

#### Section 5.9.6

The Project's proposed General Plan designation and zoning of Mixed Use-Urban, is consistent with surrounding development, and would assist in transitioning between commercial and single-family residential uses.

- 1. What specific criteria define the "Mixed Use-Urban" designation in the proposed General Plan?
- 2. How was the consistency with surrounding development assessed, and what metrics were used?
- 3. Are there any specific commercial or residential properties adjacent to the project site?
- 4. What benefits are expected from the proposed transition between commercial and single-family residential uses?
- 5. Has there been community input or feedback regarding this zoning designation?
- 6. Are there any potential challenges or conflicts related to the Mixed Use-Urban zoning?
- 7. How does this designation align with long-term urban planning goals for the area?
- 8. Is there a timeline for implementing this zoning change?
- 9. What studies or data support the assertion of consistency with surrounding development?
- 10. Are there any specific design guidelines or restrictions associated with Mixed Use-Urban zones?

#### Section 5.11.2.4

Objective LU-22: Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port Airport, Riverside, Municipal Airport, and Flabob Airports. Policy LU-22.2: Work cooperatively with the Riverside County Airport Land Use Commission in developing, defining, implementing and protecting airport influence zones around the March Air Reserve Base/Inland Port Airport, Riverside Municipal Airport, and Flabob Airport, and in implementing the new Airport Land Use Compatibility Plan

- 1. What specific criteria define the "March Air Reserve Base/Inland Port Airport influence zones"?
- 2. How does the new Airport Land Use Compatibility Plan address potential impacts on the long-term viability of the base and surrounding airports?
- 3. Are there any existing land use or transportation decisions that have raised concerns about viability?
- 4. What role does the Riverside County Airport Land Use Commission play in defining and implementing these influence zones?
- 5. How are the interests of both the March Air Reserve Base and the surrounding airports balanced in this process?
- 6. Have there been any past instances where land use decisions adversely affected the base or nearby airports?

- 7. What studies or assessments inform the policies outlined in Objective LU-22?
- 8. Are there specific measures in place to protect against incompatible development near the airports?
- 9. How does the cooperation between the developer and the Airport Land Use Commission occur practically?
- 10. Is there a timeline for implementing the new Airport Land Use Compatibility Plan?

The GP 2025 Land Use and Urban Design Element additionally provides a number of "smart growth" principles. A major tenet of smart growth includes focusing development in already urbanized areas of the City, rather than spreading growth to urban fringes,

which reduces urban sprawl. The Smart Growth Network has defined the ten principles of smart growth:

- 1. What are the benefits of mixing land uses in urban planning?<sup>1</sup>
- 2. How does compact building design contribute to smart growth?<sup>1</sup>
- 3. Why is preserving open space important for smart growth?<sup>1</sup>
- 4. How does mixed land use enhance community vitality and security?<sup>1</sup>
- 5. What economic advantages can be gained by siting commercial areas close to residential neighborhoods?<sup>1</sup>
- 6. How does smart growth support diverse housing options?<sup>2</sup>
- 7. What role does walkability play in creating smart growth neighborhoods?<sup>2</sup>
- 8. How can communities encourage more efficient use of land and resources in building design?<sup>1</sup>
- 9. Why is density important for viable public transit networks?<sup>1</sup>
- 10. What environmental benefits are associated with compact building design?

#### Section 5.11.2.4

- 1. Mix land uses.2. Take advantage of compact building design.3. Create a range of housing opportunities and choices.4. Create walkable neighborhoods.5. Foster distinctive, attractive communities with a strong sense of place.6. Preserve open space, farmland, natural beauty and critical environmental areas.7. Strengthen and direct development toward existing communities.7. Strengthen and direct development toward existing communities.9. Make development decisions predictable, fair and cost effective.10. Encourage community and stakeholder collaboration in development decisions.
  - 1. How do you plan to integrate mixed-use development into your project, and what specific combinations of residential, commercial, and recreational spaces are you considering?

- 2. Can you elaborate on your strategies for compact building design? How will you balance density with quality of life for residents?
- 3. What range of housing types and price points are you including in your development to ensure diverse housing opportunities?
- 4. What specific features are you incorporating to enhance walkability, such as pedestrian infrastructure, traffic calming measures, or strategic placement of amenities?
- 5. How will you incorporate local cultural or historical elements into your design to create a strong sense of place unique to this community?
- 6. What measures are you taking to preserve or enhance natural areas within or adjacent to your development? How will you balance development needs with environmental conservation?
- 7. In what ways does your project support or revitalize existing communities nearby? Are you considering any brownfield redevelopment opportunities?
- 8. How are you working with local authorities to streamline the development process while ensuring it remains fair and transparent?
- 9. What methods are you using to engage the community and incorporate stakeholder feedback throughout the planning and development process?
- 10. How does your project address sustainability concerns, such as energy efficiency, water conservation, or resilience to climate change impacts?

## **Section 5.11.6**

Threshold B: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? City of Riverside General Plan 2025, Consistency with General Plan Policies

- 1. How does your project align with the specific land use designations outlined in the City of Riverside General Plan 2025?
- 2. Are there any aspects of your project that require variances or amendments to existing zoning ordinances? If so, what are they and how do you justify these changes?
- 3. How does your development plan address any environmental protection policies specified in the General Plan, particularly those aimed at avoiding or mitigating environmental effects?

- 4. Can you provide a detailed analysis of how your project complies with or enhances the goals set forth in any applicable specific plans for the area?
- 5. Are there any local coastal program requirements that apply to your project site? If so, how does your plan adhere to these regulations?
- 6. How does your project contribute to or align with the City's long-term vision for sustainable development as outlined in the General Plan?
- 7. Are there any potential conflicts between your proposed development and the City's policies on preserving open spaces or environmentally sensitive areas?
- 8. How does your project address any applicable policies related to traffic management, public transportation, or alternative transportation methods as outlined in the General Plan?
- 9. Can you explain how your development plan considers and incorporates any relevant historical or cultural preservation policies that may apply to the project area?
- 10. Are there any specific environmental mitigation measures required by local regulations that you've incorporated into your project design? How do these measures go beyond minimum compliance?

Several multi-family residential uses are located in Zone C2, near the Project site. There is a condominium complex, Mission Villas, located at 200 E. Alessandro Boulevard, adjacent to the Project site, across from Alessandro Boulevard. The Mission Grove Park apartments, located at 7450 Northrop Drive, are located closer to the end of Runway 14-32 than the Project. Mission Grove Park consists of 432 units and has a density of 16 dwelling units per acre. Estancia, located at 7871 Mission Grove Parkway South, consists of 208 units and has a density of 1.3 du/ac. The Project is consistent with other multifamily residential developments in the C2 Zone. Additionally, the Project consist of infill development of a commercial site. The vast majority of Zone C2 in the City of Riverside has been built out, largely by single family residences. Few infill sites, such as the Project are available for development. As such, the Project would not encourage other developments to exceed Zone C2 density standards or encroach upon MARB/IPA operations.

- 1. How does the density of your proposed project compare specifically to the Mission Grove Park apartments and Estancia developments mentioned in the EIR?
- 2. What measures are you taking to ensure compatibility with the adjacent Mission Villas condominium complex across Alessandro Boulevard?

- 3. Given that your project is an infill development in a largely built-out area, how are you addressing potential impacts on existing infrastructure and services?
- 4. Can you provide more details on how your project design considers its proximity to Runway 14-32 and any associated noise or safety concerns?
- 5. How does your project contribute to the City's goals for infill development, and what specific benefits does it bring to the area?
- 6. Are there any unique features or amenities in your project that differentiate it from other multi-family developments in Zone C2?
- 7. How have you addressed potential concerns about increased traffic or parking demands in this already developed area?
- 8. Given the project's location in Zone C2 near MARB/IPA operations, what specific design elements or operational procedures are you implementing to ensure compatibility with airport activities?
- 9. How does your project balance the need for housing with the preservation of any existing commercial uses in the area?
- 10. Can you elaborate on any sustainable or green building practices you're incorporating into this infill development, considering its urban context?

Therefore, the Project will not affect the orderly expansion of the MARB/IPA. A City Council proposed overrule of an ALUC action must provide a copy of the proposed decision and findings to both ALUC and the California Division of Aeronautics, a minimum of 45 days prior to decision to overrule ALUC. These agencies have 30 days in which to provide comments to City Council.

- 1. Can you elaborate on the specific reasons why your project will not affect the orderly expansion of the MARB/IPA (March Air Reserve Base/Inland Port Airport)?
- 2. Have you had any preliminary discussions with the Airport Land Use Commission (ALUC) regarding your project? If so, what feedback have you received?
- 3. What specific aspects of your project design or operations ensure compatibility with MARB/IPA activities?
- 4. Are there any modifications you're willing to make to your project to address potential ALUC concerns and avoid the need for a City Council overrule?
- 5. How does your project align with the current Airport Land Use Compatibility Plan for MARB/IPA?
- 6. Have you conducted any noise or safety studies related to the project's proximity to MARB/IPA? If so, what were the findings?

- 7. What is your contingency plan if the California Division of Aeronautics provides comments that are not in favor of your project?
- 8. How do you plan to address any potential concerns from current residents about increased development near MARB/IPA?
- 9. Are there any height restrictions or other development limitations due to the project's location relative to MARB/IPA, and how have you accommodated these in your design?
- 10. Have you considered any potential future expansion plans of MARB/IPA in your project design? If so, how?

ALUC: Project would result in a significant and unavoidable impact. Although implementation of the recommended conditions identified in the Riverside County Airport Land Use Commission (ALUC) Staff Report for the Project would not render the Project consistent with the MARB/IPA LUCP Compatibility Zone C2 density compatibility criteria, they would be implemented, in order to reduce the potential hazards from flight accidents to the greatest extent feasible.

- 1. Can you provide a detailed explanation of the specific conditions recommended by the ALUC Staff Report for your project?
- 2. How exactly do you plan to implement these recommended conditions, and what impact will they have on your original project design?
- 3. Given that these conditions won't make the project fully consistent with the MARB/IPA LUCP Compatibility Zone C2 density criteria, what additional measures are you considering to further mitigate potential risks?
- 4. How do you justify proceeding with the project despite the ALUC's assessment of a "significant and unavoidable impact"?
- 5. Can you elaborate on the specific ways your project exceeds the density compatibility criteria for Zone C2, and why you believe this higher density is necessary or beneficial?
- 6. What specific design features or operational procedures are you incorporating to "reduce the potential hazards from flight accidents to the greatest extent feasible"?
- 7. Have you conducted any independent risk assessments or safety studies to complement the ALUC's findings? If so, what were the results?
- 8. How do you plan to communicate the potential risks and mitigation measures to future residents or users of your development?

- 9. Are there any innovative or unconventional approaches you're considering to address the density compatibility issues while still meeting your project goals?
- 10. Given the ALUC's concerns, have you explored alternative locations for this project that might be more compatible with the LUCP criteria? If so, why were they deemed less suitable?

## **Section 5.14.6**

Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

- 1. How does your project's proposed population density compare to the current population projections for this area in the city's general plan or other planning documents?
- 2. Can you provide specific data on the number of new residents your project is expected to bring to the area, and how this compares to the area's current population?
- 3. What analysis have you conducted to determine the impact of your project on local infrastructure, such as water supply, sewage systems, and electrical grid capacity?
- 4. How does your project align with or deviate from any existing neighborhood or community plans for this area?
- 5. Are there any aspects of your project that might indirectly encourage further development or population growth in the surrounding area? If so, how do you plan to address this?
- 6. What measures are you taking to ensure that local services (such as schools, healthcare facilities, and emergency services) can accommodate the potential population increase?
- 7. How does your project contribute to or impact the jobs-housing balance in the area? Are you proposing any commercial or business spaces along with residential units?
- 8. Have you conducted any studies on the potential impact of your project on local traffic patterns and public transportation needs? If so, what were the findings?
- 9. Are there any features of your project designed to mitigate potential negative impacts of population growth, such as green spaces, community facilities, or sustainability measures?
- 10. How does your project address affordable housing needs, if at all, and how might this impact population demographics in the area?

#### Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040

- 1. How does your project's projected population contribution align with the city's anticipated growth of 58,445 people from 2020 to 2040?
- 2. Can you provide specific details on how your project will utilize or impact the existing services, access, and infrastructure that were planned for in the General Plan 2025?
- 3. Have you conducted any studies to determine if the current infrastructure capacity can adequately support your project, or will upgrades be necessary?
- 4. How does your project contribute to or align with the goals set forth in the 6th Cycle Housing Element?
- 5. Are there any aspects of your development that go beyond what was anticipated in the General Plan 2025? If so, how do you plan to address potential discrepancies?
- 6. Can you explain how your project might impact the city's ability to accommodate future growth beyond 2040?
- 7. What measures are you taking to ensure that your project doesn't strain existing services or infrastructure beyond what was planned for in the General Plan 2025?
- 8. How does your project contribute to a balanced distribution of population growth across the city, as envisioned in the General Plan?
- 9. Are there any innovative features in your project that could help the city better manage population growth or improve service delivery? 10. Given the projected population growth, how does your project address potential concerns about increased density, such as traffic congestion or loss of open space?

## Section 5.16.4

Project Design- Parks -The Zoning Code requires 150 square feet of common usable open space per unit for projects in the Mixed-Use – Urban Zone, for a total of 52,050 square feet of required open space. The applicant is proposing a Specific Plan Amendment to require 75 square feet of common usable open space per unit for the Mixed-Use – Urban designation, for a total of 26,025

square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres.

- 1. Can you explain in detail why you are proposing to reduce the required common usable open space from 150 to 75 square feet per unit?
- 2. How do you justify that 75 square feet of open space per unit is sufficient for the residents' needs and quality of life?
- 3. What specific amenities or features are you planning to include in the 28,611 square feet of common open space to maximize its usability and value to residents?
- 4. How does your proposed open space allocation compare to similar projects in the area or other Mixed-Use Urban developments in the city?
- 5. Have you conducted any studies or surveys to assess resident preferences or needs regarding open space in high-density urban environments?
- 6. How will the reduction in open space impact the overall environmental quality of the project, including aspects like heat island effect, stormwater management, and biodiversity?
- 7. Are you proposing any innovative design solutions to compensate for the reduced open space, such as vertical gardens, rooftop spaces, or other alternatives?
- 8. How does your proposed open space allocation align with the city's broader goals for green space and livability in urban areas?
- 9. What measures are you taking to ensure that the reduced open space doesn't negatively impact the mental and physical well-being of residents?
- 10. If the Specific Plan Amendment is not approved, how would you modify your project to meet the current requirement of 150 square feet of open space per unit?

## Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units

- 1. How did you determine that 58 dwelling units would be an appropriate number for this reduced density alternative?
- 2. How does this reduced density alternative impact the project's ability to meet local housing needs and goals?

- 3. Can you provide a comparison of the environmental impacts (e.g., traffic, noise, air quality) between the proposed 347-unit project and this 58-unit alternative?
- 4. How would the reduced density affect the economic feasibility of the project? Are there significant changes to the cost-benefit ratio?
- 5. Would the reduced density allow for any additional amenities or open space that aren't possible in the higher-density proposal?
- 6. How does this alternative align with local zoning and land use designations? Would it still require any variances or amendments?
- 7. Can you explain how this reduced density alternative would impact the project's contribution to the City's Climate Action Plan goals?
- 8. How would the architectural design and overall site layout change with this reduced density? Would it still maintain the same general character as the proposed project?
- 9. Would this alternative still be considered an efficient use of infill development, given the significant reduction in units?
- 10. How does this reduced density alternative impact the project's ability to provide affordable housing units, if any were planned in the original proposal?

Alternative 3, the Retail Development Alternative, would consist of retaining the existing retail building and associated surface parking lot with only minor improvements to the inside and/or exterior of the building and/or associated surface parking lot and landscaping. The existing building would house a permanent retail tenant utilizing the full square footage of the building for retail.

- 1. How does the potential economic impact of a full-scale retail development compare to the proposed residential project in terms of job creation and local tax revenue?
- 2. What types of minor improvements are being considered for the existing building and parking lot, and how would these impact the overall environmental footprint of the site?
- 3. How does this retail alternative align with current market demands and trends in the area? Is there a demonstrated need for additional retail space?
- 4. Can you provide a comparative analysis of the traffic impacts between this retail alternative and the proposed residential project?
- 5. How would retaining the existing building affect the site's ability to incorporate modern sustainability features or meet current energy efficiency standards?

- 6. Does this alternative align with the City's long-term vision for land use in this area, particularly given the trend towards mixed-use developments?
- 7. How would this retail alternative impact the local housing supply and the City's ability to meet its housing goals?
- 8. What would be the comparative impact on local services (e.g., schools, emergency services) between this retail alternative and the proposed residential project?
- 9. How does this alternative address or fail to address any identified community needs or preferences that were factored into the original project proposal?
- 10. Given that this alternative retains the existing structure, how does it compare to the proposed project in terms of potential impacts on local character and aesthetics?

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- 1. Why was no specific off-site location considered for the proposed 347 residential apartment project?
- 2. How was the size of the potential off-site location determined for this project?
- 3. Can you provide more details on the process used to identify vacant or underutilized buildings within the City of Riverside?
- 4. What criteria were used to determine if a building or site was considered "underutilized" for this project?
- 5. How does the developer plan to address any potential environmental concerns related to the redevelopment of vacant or underutilized buildings?
- 6. What is the estimated timeline for the identification and acquisition of a suitable off-site location for this project?
- 7. How will the developer engage with the local community to gather input and address concerns related to the proposed off-site location?
- 8. Are there any zoning or land use restrictions that could impact the selection of a potential off-site location for this project?

- 9. What are the potential impacts on traffic and transportation infrastructure in the surrounding area if the project is developed at an off-site location?
- 10. How will the developer ensure that the proposed off-site location is consistent with the City of Riverside's long-term planning and development goals?

#### Section 1.3

The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

- 1. How will the proposed apartment project integrate with the existing retail environment in terms of design and aesthetics?
- 2. What specific pedestrian connectivity features will be included in the project design to enhance walkability?
- 3. How will the project ensure adequate shared parking for both residential and retail uses?
- 4. What measures will be taken to minimize potential conflicts between pedestrians and vehicles in the project area?
- 5. How will the project contribute to the overall vitality and economic growth of the surrounding retail environment?
- 6. Will the project include any ground-floor retail or commercial uses to complement the existing retail environment?
- 7. How will the project address any potential noise or privacy concerns for residents living in close proximity to retail uses?
- 8. What strategies will be employed to ensure the safety and security of both residents and retail patrons within the project area?
- 9. How will the project incorporate sustainable design elements to promote environmental stewardship and reduce its carbon footprint?
- 10. Will the project include any public or open space amenities for use by both residents and the broader community?

## Section 1.5

The city received only one comment letter in response to the NOP and no comments during the virtual scoping meeting.

1. How did the city ensure that adequate notice was provided to potentially interested parties regarding the NOP and virtual scoping meeting?

- 2. What outreach efforts were made to engage potentially affected communities and stakeholders in the environmental review process?
- 3. How will the developer address potential concerns or issues that may arise during the environmental review process, given the limited public input received thus far?
- 4. Are there any specific environmental or community impacts that the developer anticipates will be raised during the environmental review process?
- 5. How will the developer ensure that the project is designed and constructed in a manner that minimizes potential environmental impacts?
- 6. Will the developer consider conducting additional outreach or engagement efforts to solicit input from potentially affected communities and stakeholders as the project moves forward?
- 7. How will the developer address any potential conflicts between the proposed project and existing land uses or community plans in the surrounding area?
- 8. Are there any unique or sensitive environmental features in the project area that will require special consideration or mitigation measures during project design and construction?
- 9. How will the developer ensure that the project complies with all applicable environmental regulations and permitting requirements?
- 10. Will the developer provide regular updates to the community and stakeholders regarding the progress of the environmental review process and opportunities for public input?

#### Section 1.6

This type of EIR should focus primarily on the changes in the environment that would result from the development project.

- 1. Can you provide a detailed description of the project's impact on local wildlife habitats and any mitigation measures planned?
- 2. How will the development affect the air quality in the surrounding area during and after construction?
- 3. What measures are being taken to manage and mitigate noise pollution resulting from the project?
- 4. How will the project impact local water resources, including both surface water and groundwater?
- 5. Are there any anticipated effects on the soil stability and erosion in the area due to the development?
- 6. How does the project plan to address and manage waste generated during construction and operational phases?
- 7. What is the expected impact on the local vegetation, and are there any plans for reforestation or other compensatory planting?
- 8. How will the project affect the local climate or microclimate, if at all?

- 9. Are there any cultural or historical sites within the project area that might be impacted, and how will these be protected?
- 10. What steps are being taken to ensure that the development is sustainable and minimizes its carbon footprint?

## Section 2.3

The City held a virtual EIR Public Scoping Meeting on November 2, 2022, from 6 PM to 7 PM.

- 1. What methods were used to notify residents about the virtual EIR Public Scoping Meeting?
- 2. Were there any follow-up communications to remind residents about the meeting?
- 3. Can you provide a breakdown of the attendance numbers and demographics for the meeting?
- 4. How were the meeting details (date, time, platform) communicated to the public?
- 5. Were any alternative methods of participation offered for those who could not attend the virtual meeting?
- 6. How was feedback from the meeting documented and will it be made available to the public?
- 7. Were there any technical issues reported by attendees during the virtual meeting, and how were they addressed?
- 8. How was the effectiveness of the meeting communication strategy evaluated?
- 9. Were residents provided with materials or information in advance of the meeting to prepare them for the discussion?
- 10. Are there plans for additional public meetings or other forms of community engagement as the project progresses?

## Section 3.2

Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

- 1. What are the specific boundaries of the project site within the Mission Grove Specific Plan area?
- 2. How does the project align with the goals and objectives of the Retail Business & Office designation?

- 3. What types of businesses or offices are anticipated to be included in the project?
- 4. What is the projected timeline for the development of the project site?
- 5. How will the project impact the existing infrastructure and public services in the area?
- 6. Are there any planned improvements to transportation or pedestrian access within the project site?
- 7. What measures will be taken to mitigate any potential environmental impacts of the project?
- 8. How will the project contribute to the local economy and job market?
- 9. What community amenities or public spaces are included in the project plan?
- 10. How will the project address sustainability and incorporate green building practices?

## Section 3.3.5

The proposed Project includes a total of 347 studio, one-, two-, and three-bedroom residential apartment units within five, 4-story buildings. The proposed Project is anticipated to house approximately 829 tenants. 56% -1 bdrm or less, 41%- 2 bdrm, 3%- 3 bdrm

- 1. Can you provide the market data that was used to determine the mix of unit sizes for the proposed project?
- 2. How has the demand for different unit sizes changed post-COVID, and how does this affect the proposed unit mix?
- 3. What considerations were made regarding the location of the residential units within a shopping center?
- 4. How will the project address potential concerns from tenants about living in a shopping center environment?
- 5. What amenities and services will be provided to make the residential units more attractive to potential tenants?
- 6. How will parking be managed for the 829 tenants, and are there plans for dedicated residential parking?
- 7. What measures are being taken to ensure privacy and security for residents living in a shopping center?
- 8. How does the project plan to integrate residential and commercial spaces to create a balanced and cohesive community?
- 9. Are there any plans to conduct updated market research to validate the proposed unit mix?
- 10. What is the projected occupancy rate for the different unit types, and what strategies will be used to achieve these rates?

## Section 3.3.5

Parking- The Project includes 604 parking spaces in total. Of these, 513 parking spaces will be dedicated for the Proposed apartment project, and 91 will be shared between the Proposed apartment project and the existing adjacent retail site. The shared parking will be memorialized in a new covenant and restriction agreement between the residential developer entity and Mission Grove Plaza. 58 spaces are Tandem.

- 1. Can you provide the rationale behind the decision to include 58 tandem parking spaces, and how will these be allocated among tenants?
- 2. What data supports the need for 513 parking spaces within the project and the additional 91 shared spaces with the shopping center?
- 3. How will the shared parking agreement with Mission Grove Plaza be enforced to ensure availability for both residential and retail users?
- 4. What measures are being taken to discourage tenants from opting out of paying for parking and using the shopping center's parking instead?
- 5. How will the project address potential overflow parking issues that may arise due to the limited parking spaces?
- 6. Are there any plans to improve the reliability and usage of the transit corridor to reduce dependence on auto transportation?
- 7. What alternatives to traditional parking are being considered to accommodate tenants who may not own a vehicle?
- 8. How will the project ensure that the parking provided is sufficient for the needs of all tenants, especially in an area not conducive to people without auto transportation?
- 9. What impact analysis has been conducted to understand the effect of limited parking on both the residential project and the adjacent retail site?
- 10. Are there any plans to conduct a parking utilization study postoccupancy to assess the adequacy of the parking provisions and make adjustments if necessary?

# Section 3.4

• Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. • Increase the type and amount of housing available consistent with the goals of the City's Housing Element.

- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
  - 1. Can you provide specific data or studies that support the projected future housing demand and how it relates to high-density urban apartments in this suburban neighborhood?
  - 2. What criteria were used to determine that this location is suitable for high-density residential development and not for continued commercial use?
  - 3. How does the proposed development align with the City's Housing Element goals, and what specific targets does it aim to meet?
  - 4. Can you provide more details on the green building practices and sustainable development methods that will be implemented in this project?
  - 5. What measures will be taken to ensure that the mixed-use environment encourages walkability and integrates seamlessly with the existing community?
  - 6. How will the project address concerns about the loss of commercial space and its impact on future commercial growth in the area?
  - 7. What specific amenities and transit corridors are in close proximity to the proposed development, and how will they benefit the residents?
  - 8. Can you provide examples of enhanced residential architecture and design elements that will be used to ensure compatibility with the surrounding residential environment?
  - 9. What are the projected economic impacts of replacing commercial property with residential units on the local economy and job market?

10. How will the project contribute to the City's Climate Action Plan, and what measurable outcomes are expected in terms of sustainability and environmental impact?

# **Summary**

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Lewis Allen 232 Bathurst Road Riverside, CA 92506 Mission Grove Neighborhood Alliance

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---- Forwarded Message -----

From: Brian Kerr <bri>sunward.com><br/>To: Lewis Allen <br/>| jmallen@aol.com>

**Sent:** Monday, June 24, 2024 at 01:01:40 PM PDT

Subject: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

230 Questions for you, and I have another 230 different questions.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

# VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 5.9.6

Due to the inconsistency of the maximum residential density, the project would result in a significant and unavoidable impact. There are no feasible mitigation measures that would reduce impacts related to inconsistency with the residential density criteria.

- 1. What specific factors contribute to the inconsistency in maximum residential density?
- 2. Has the project team explored alternative zoning or land use scenarios to address this issue?
- 3. Are there any legal or regulatory implications associated with the inconsistency in density criteria?

- 4. How does the impact of inconsistent density affect neighboring properties or communities?
- 5. Is there a threshold or benchmark for what constitutes "significant" impact in this context?
- 6. Have other similar projects faced similar challenges related to residential density?
- 7. What data or studies were used to determine that no feasible mitigation measures exist?
- 8. Are there any precedents where projects with similar density issues were successfully resolved?
- 9. How does the inconsistency impact the overall project timeline and budget?
- 10. What steps can be taken to minimize the unavoidable impact while adhering to density criteria?

## Section 5.9.6

The Project's proposed General Plan designation and zoning of Mixed Use-Urban, is consistent with surrounding development, and would assist in transitioning between commercial and single-family residential uses.

- 1. What specific criteria define the "Mixed Use-Urban" designation in the proposed General Plan?
- 2. How was the consistency with surrounding development assessed, and what metrics were used?
- 3. Are there any specific commercial or residential properties adjacent to the project site?
- 4. What benefits are expected from the proposed transition between commercial and single-family residential uses?
- 5. Has there been community input or feedback regarding this zoning designation?
- 6. Are there any potential challenges or conflicts related to the Mixed Use-Urban zoning?
- 7. How does this designation align with long-term urban planning goals for the area?
- 8. Is there a timeline for implementing this zoning change?
- 9. What studies or data support the assertion of consistency with surrounding development?
- 10. Are there any specific design guidelines or restrictions associated with Mixed Use-Urban zones?

## Section 5.11.2.4

Objective LU-22: Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port Airport, Riverside, Municipal Airport, and Flabob Airports. Policy LU-22.2: Work cooperatively with the Riverside County Airport Land Use Commission in developing, defining, implementing and protecting airport influence zones around the March Air Reserve

Base/Inland Port Airport, Riverside Municipal Airport, and Flabob Airport, and in implementing the new Airport Land Use Compatibility Plan

- 1. What specific criteria define the "March Air Reserve Base/Inland Port Airport influence zones"?
- 2. How does the new Airport Land Use Compatibility Plan address potential impacts on the long-term viability of the base and surrounding airports?
- 3. Are there any existing land use or transportation decisions that have raised concerns about viability?
- 4. What role does the Riverside County Airport Land Use Commission play in defining and implementing these influence zones?
- 5. How are the interests of both the March Air Reserve Base and the surrounding airports balanced in this process?
- 6. Have there been any past instances where land use decisions adversely affected the base or nearby airports?
- 7. What studies or assessments inform the policies outlined in Objective LU-22?
- 8. Are there specific measures in place to protect against incompatible development near the airports?
- 9. How does the cooperation between the developer and the Airport Land Use Commission occur practically?
- 10. Is there a timeline for implementing the new Airport Land Use Compatibility Plan?

The GP 2025 Land Use and Urban Design Element additionally provides a number of "smart growth" principles. A major tenet of smart growth includes focusing development in already urbanized areas of the City, rather than spreading growth to urban fringes,

which reduces urban sprawl. The Smart Growth Network has defined the ten principles of smart growth:

- 1. What are the benefits of mixing land uses in urban planning?<sup>1</sup>
- 2. How does compact building design contribute to smart growth?<sup>1</sup>
- 3. Why is preserving open space important for smart growth?<sup>1</sup>
- 4. How does mixed land use enhance community vitality and security?<sup>1</sup>
- 5. What economic advantages can be gained by siting commercial areas close to residential neighborhoods?<sup>1</sup>
- 6. How does smart growth support diverse housing options?<sup>2</sup>
- 7. What role does walkability play in creating smart growth neighborhoods?<sup>2</sup>
- 8. <u>How can communities encourage more efficient use of land and resources in</u> building design?<sup>1</sup>
- 9. Why is density important for viable public transit networks?
- 10. What environmental benefits are associated with compact building design?

- 1. Mix land uses.2. Take advantage of compact building design.3. Create a range of housing opportunities and choices.4. Create walkable neighborhoods.5. Foster distinctive, attractive communities with a strong sense of place.6. Preserve open space, farmland, natural beauty and critical environmental areas.7. Strengthen and direct development toward existing communities.7. Strengthen and direct development toward existing communities.9. Make development decisions predictable, fair and cost effective.10. Encourage community and stakeholder collaboration in development decisions.
  - 1. How do you plan to integrate mixed-use development into your project, and what specific combinations of residential, commercial, and recreational spaces are you considering?
  - 2. Can you elaborate on your strategies for compact building design? How will you balance density with quality of life for residents?
  - 3. What range of housing types and price points are you including in your development to ensure diverse housing opportunities?
  - 4. What specific features are you incorporating to enhance walkability, such as pedestrian infrastructure, traffic calming measures, or strategic placement of amenities?
  - 5. How will you incorporate local cultural or historical elements into your design to create a strong sense of place unique to this community?
  - 6. What measures are you taking to preserve or enhance natural areas within or adjacent to your development? How will you balance development needs with environmental conservation?
  - 7. In what ways does your project support or revitalize existing communities nearby? Are you considering any brownfield redevelopment opportunities?
  - 8. How are you working with local authorities to streamline the development process while ensuring it remains fair and transparent?
  - 9. What methods are you using to engage the community and incorporate stakeholder feedback throughout the planning and development process? 10. How does your project address sustainability concerns, such as energy efficiency, water conservation, or resilience to climate change impacts?

## **Section 5.11.6**

Threshold B: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? City of Riverside General Plan 2025, Consistency with General Plan Policies

1. How does your project align with the specific land use designations outlined in the City of Riverside General Plan 2025?

- 2. Are there any aspects of your project that require variances or amendments to existing zoning ordinances? If so, what are they and how do you justify these changes?
- 3. How does your development plan address any environmental protection policies specified in the General Plan, particularly those aimed at avoiding or mitigating environmental effects?
- 4. Can you provide a detailed analysis of how your project complies with or enhances the goals set forth in any applicable specific plans for the area?
- 5. Are there any local coastal program requirements that apply to your project site? If so, how does your plan adhere to these regulations?
- 6. How does your project contribute to or align with the City's long-term vision for sustainable development as outlined in the General Plan?
- 7. Are there any potential conflicts between your proposed development and the City's policies on preserving open spaces or environmentally sensitive areas?
- 8. How does your project address any applicable policies related to traffic management, public transportation, or alternative transportation methods as outlined in the General Plan?
- 9. Can you explain how your development plan considers and incorporates any relevant historical or cultural preservation policies that may apply to the project area?
- 10. Are there any specific environmental mitigation measures required by local regulations that you've incorporated into your project design? How do these measures go beyond minimum compliance?

Several multi-family residential uses are located in Zone C2, near the Project site. There is a condominium complex, Mission Villas, located at 200 E. Alessandro Boulevard, adjacent to the Project site, across from Alessandro Boulevard. The Mission Grove Park apartments, located at 7450 Northrop Drive, are located closer to the end of Runway 14-32 than the Project. Mission Grove Park consists of 432 units and has a density of 16 dwelling units per acre. Estancia, located at 7871 Mission Grove Parkway South, consists of 208 units and has a density of 1.3 du/ac. The Project is consistent with other multi-family residential developments in the C2 Zone. Additionally, the Project consist of infill development of a commercial site. The vast majority of Zone C2 in the City of Riverside has been built out, largely by single family residences. Few infill sites, such as the Project are available for development. As such, the Project would not encourage other developments to exceed Zone C2 density standards or encroach upon MARB/IPA operations.

1. How does the density of your proposed project compare specifically to the Mission Grove Park apartments and Estancia developments mentioned in the EIR?

- 2. What measures are you taking to ensure compatibility with the adjacent Mission Villas condominium complex across Alessandro Boulevard?
- 3. Given that your project is an infill development in a largely built-out area, how are you addressing potential impacts on existing infrastructure and services?
- 4. Can you provide more details on how your project design considers its proximity to Runway 14-32 and any associated noise or safety concerns?
- 5. How does your project contribute to the City's goals for infill development, and what specific benefits does it bring to the area?
- 6. Are there any unique features or amenities in your project that differentiate it from other multi-family developments in Zone C2?
- 7. How have you addressed potential concerns about increased traffic or parking demands in this already developed area?
- 8. Given the project's location in Zone C2 near MARB/IPA operations, what specific design elements or operational procedures are you implementing to ensure compatibility with airport activities?
- 9. How does your project balance the need for housing with the preservation of any existing commercial uses in the area?
- 10. Can you elaborate on any sustainable or green building practices you're incorporating into this infill development, considering its urban context?

Therefore, the Project will not affect the orderly expansion of the MARB/IPA. A City Council proposed overrule of an ALUC action must provide a copy of the proposed decision and findings to both ALUC and the California Division of Aeronautics, a minimum of 45 days prior to decision to overrule ALUC. These agencies have 30 days in which to provide comments to City Council.

- 1. Can you elaborate on the specific reasons why your project will not affect the orderly expansion of the MARB/IPA (March Air Reserve Base/Inland Port Airport)?
- 2. Have you had any preliminary discussions with the Airport Land Use Commission (ALUC) regarding your project? If so, what feedback have you received?
- 3. What specific aspects of your project design or operations ensure compatibility with MARB/IPA activities?
- 4. Are there any modifications you're willing to make to your project to address potential ALUC concerns and avoid the need for a City Council overrule?
- 5. How does your project align with the current Airport Land Use Compatibility Plan for MARB/IPA?
- 6. Have you conducted any noise or safety studies related to the project's proximity to MARB/IPA? If so, what were the findings?
- 7. What is your contingency plan if the California Division of Aeronautics provides comments that are not in favor of your project?

- 8. How do you plan to address any potential concerns from current residents about increased development near MARB/IPA?
- 9. Are there any height restrictions or other development limitations due to the project's location relative to MARB/IPA, and how have you accommodated these in your design?
- 10. Have you considered any potential future expansion plans of MARB/IPA in your project design? If so, how?

ALUC: Project would result in a significant and unavoidable impact. Although implementation of the recommended conditions identified in the Riverside County Airport Land Use Commission (ALUC) Staff Report for the Project would not render the Project consistent with the MARB/IPA LUCP Compatibility Zone C2 density compatibility criteria, they would be implemented, in order to reduce the potential hazards from flight accidents to the greatest extent feasible.

- 1. Can you provide a detailed explanation of the specific conditions recommended by the ALUC Staff Report for your project?
- 2. How exactly do you plan to implement these recommended conditions, and what impact will they have on your original project design?
- 3. Given that these conditions won't make the project fully consistent with the MARB/IPA LUCP Compatibility Zone C2 density criteria, what additional measures are you considering to further mitigate potential risks?
- 4. How do you justify proceeding with the project despite the ALUC's assessment of a "significant and unavoidable impact"?
- 5. Can you elaborate on the specific ways your project exceeds the density compatibility criteria for Zone C2, and why you believe this higher density is necessary or beneficial?
- 6. What specific design features or operational procedures are you incorporating to "reduce the potential hazards from flight accidents to the greatest extent feasible"?
- 7. Have you conducted any independent risk assessments or safety studies to complement the ALUC's findings? If so, what were the results?
- 8. How do you plan to communicate the potential risks and mitigation measures to future residents or users of your development?
- 9. Are there any innovative or unconventional approaches you're considering to address the density compatibility issues while still meeting your project goals? 10. Given the ALUC's concerns, have you explored alternative locations for this project that might be more compatible with the LUCP criteria? If so, why were they deemed less suitable?

#### Section 5.14.6

Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

- 1. How does your project's proposed population density compare to the current population projections for this area in the city's general plan or other planning documents?
- 2. Can you provide specific data on the number of new residents your project is expected to bring to the area, and how this compares to the area's current population?
- 3. What analysis have you conducted to determine the impact of your project on local infrastructure, such as water supply, sewage systems, and electrical grid capacity?
- 4. How does your project align with or deviate from any existing neighborhood or community plans for this area?
- 5. Are there any aspects of your project that might indirectly encourage further development or population growth in the surrounding area? If so, how do you plan to address this?
- 6. What measures are you taking to ensure that local services (such as schools, healthcare facilities, and emergency services) can accommodate the potential population increase?
- 7. How does your project contribute to or impact the jobs-housing balance in the area? Are you proposing any commercial or business spaces along with residential units?
- 8. Have you conducted any studies on the potential impact of your project on local traffic patterns and public transportation needs? If so, what were the findings?
- 9. Are there any features of your project designed to mitigate potential negative impacts of population growth, such as green spaces, community facilities, or sustainability measures?
- 10. How does your project address affordable housing needs, if at all, and how might this impact population demographics in the area?

#### Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040

- 1. How does your project's projected population contribution align with the city's anticipated growth of 58,445 people from 2020 to 2040?
- 2. Can you provide specific details on how your project will utilize or impact the existing services, access, and infrastructure that were planned for in the General Plan 2025?
- 3. Have you conducted any studies to determine if the current infrastructure capacity can adequately support your project, or will upgrades be necessary?
- 4. How does your project contribute to or align with the goals set forth in the 6th Cycle Housing Element?
- 5. Are there any aspects of your development that go beyond what was anticipated in the General Plan 2025? If so, how do you plan to address potential discrepancies?
- 6. Can you explain how your project might impact the city's ability to accommodate future growth beyond 2040?
- 7. What measures are you taking to ensure that your project doesn't strain existing services or infrastructure beyond what was planned for in the General Plan 2025?
- 8. How does your project contribute to a balanced distribution of population growth across the city, as envisioned in the General Plan?
- 9. Are there any innovative features in your project that could help the city better manage population growth or improve service delivery?
- 10. Given the projected population growth, how does your project address potential concerns about increased density, such as traffic congestion or loss of open space?

## Section 5.16.4

Project Design- Parks -The Zoning Code requires 150 square feet of common usable open space per unit for projects in the Mixed-Use – Urban Zone, for a total of 52,050 square feet of required open space. The applicant is proposing a Specific Plan Amendment to require 75 square feet of common usable open space per unit for the Mixed-Use – Urban designation, for a total of 26,025 square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres.

- 1. Can you explain in detail why you are proposing to reduce the required common usable open space from 150 to 75 square feet per unit?
- 2. How do you justify that 75 square feet of open space per unit is sufficient for the residents' needs and quality of life?

- 3. What specific amenities or features are you planning to include in the 28,611 square feet of common open space to maximize its usability and value to residents?
- 4. How does your proposed open space allocation compare to similar projects in the area or other Mixed-Use Urban developments in the city?
- 5. Have you conducted any studies or surveys to assess resident preferences or needs regarding open space in high-density urban environments?
- 6. How will the reduction in open space impact the overall environmental quality of the project, including aspects like heat island effect, stormwater management, and biodiversity?
- 7. Are you proposing any innovative design solutions to compensate for the reduced open space, such as vertical gardens, rooftop spaces, or other alternatives?
- 8. How does your proposed open space allocation align with the city's broader goals for green space and livability in urban areas?
- 9. What measures are you taking to ensure that the reduced open space doesn't negatively impact the mental and physical well-being of residents?

  10. If the Specific Plan Amendment is not approved, how would you modify your project to meet the current requirement of 150 square feet of open space per unit?

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units

- 1. How did you determine that 58 dwelling units would be an appropriate number for this reduced density alternative?
- 2. How does this reduced density alternative impact the project's ability to meet local housing needs and goals?
- 3. Can you provide a comparison of the environmental impacts (e.g., traffic, noise, air quality) between the proposed 347-unit project and this 58-unit alternative?
- 4. How would the reduced density affect the economic feasibility of the project? Are there significant changes to the cost-benefit ratio?
- 5. Would the reduced density allow for any additional amenities or open space that aren't possible in the higher-density proposal?
- 6. How does this alternative align with local zoning and land use designations? Would it still require any variances or amendments?
- 7. Can you explain how this reduced density alternative would impact the project's contribution to the City's Climate Action Plan goals?

- 8. How would the architectural design and overall site layout change with this reduced density? Would it still maintain the same general character as the proposed project?
- 9. Would this alternative still be considered an efficient use of infill development, given the significant reduction in units?
- 10. How does this reduced density alternative impact the project's ability to provide affordable housing units, if any were planned in the original proposal?

Alternative 3, the Retail Development Alternative, would consist of retaining the existing retail building and associated surface parking lot with only minor improvements to the inside and/or exterior of the building and/or associated surface parking lot and landscaping. The existing building would house a permanent retail tenant utilizing the full square footage of the building for retail.

- 1. How does the potential economic impact of a full-scale retail development compare to the proposed residential project in terms of job creation and local tax revenue?
- 2. What types of minor improvements are being considered for the existing building and parking lot, and how would these impact the overall environmental footprint of the site?
- 3. How does this retail alternative align with current market demands and trends in the area? Is there a demonstrated need for additional retail space?
- 4. Can you provide a comparative analysis of the traffic impacts between this retail alternative and the proposed residential project?
- 5. How would retaining the existing building affect the site's ability to incorporate modern sustainability features or meet current energy efficiency standards?
- 6. Does this alternative align with the City's long-term vision for land use in this area, particularly given the trend towards mixed-use developments?
- 7. How would this retail alternative impact the local housing supply and the City's ability to meet its housing goals?
- 8. What would be the comparative impact on local services (e.g., schools, emergency services) between this retail alternative and the proposed residential project?
- 9. How does this alternative address or fail to address any identified community needs or preferences that were factored into the original project proposal?

  10. Given that this alternative retains the existing structure, how does it compare to the proposed project in terms of potential impacts on local character and aesthetics?

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- 1. Why was no specific off-site location considered for the proposed 347 residential apartment project?
- 2. How was the size of the potential off-site location determined for this project?
- 3. Can you provide more details on the process used to identify vacant or underutilized buildings within the City of Riverside?
- 4. What criteria were used to determine if a building or site was considered "underutilized" for this project?
- 5. How does the developer plan to address any potential environmental concerns related to the redevelopment of vacant or underutilized buildings?
- 6. What is the estimated timeline for the identification and acquisition of a suitable offsite location for this project?
- 7. How will the developer engage with the local community to gather input and address concerns related to the proposed off-site location?
- 8. Are there any zoning or land use restrictions that could impact the selection of a potential off-site location for this project?
- 9. What are the potential impacts on traffic and transportation infrastructure in the surrounding area if the project is developed at an off-site location?
- 10. How will the developer ensure that the proposed off-site location is consistent with the City of Riverside's long-term planning and development goals?

#### Section 1.3

The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

- 1. How will the proposed apartment project integrate with the existing retail environment in terms of design and aesthetics?
- 2. What specific pedestrian connectivity features will be included in the project design to enhance walkability?
- 3. How will the project ensure adequate shared parking for both residential and retail uses?

- 4. What measures will be taken to minimize potential conflicts between pedestrians and vehicles in the project area?
- 5. How will the project contribute to the overall vitality and economic growth of the surrounding retail environment?
- 6. Will the project include any ground-floor retail or commercial uses to complement the existing retail environment?
- 7. How will the project address any potential noise or privacy concerns for residents living in close proximity to retail uses?
- 8. What strategies will be employed to ensure the safety and security of both residents and retail patrons within the project area?
- 9. How will the project incorporate sustainable design elements to promote environmental stewardship and reduce its carbon footprint?
- 10. Will the project include any public or open space amenities for use by both residents and the broader community?

#### Section 1.5

The city received only one comment letter in response to the NOP and no comments during the virtual scoping meeting.

- 1. How did the city ensure that adequate notice was provided to potentially interested parties regarding the NOP and virtual scoping meeting?
- 2. What outreach efforts were made to engage potentially affected communities and stakeholders in the environmental review process?
- 3. How will the developer address potential concerns or issues that may arise during the environmental review process, given the limited public input received thus far?
- 4. Are there any specific environmental or community impacts that the developer anticipates will be raised during the environmental review process?
- 5. How will the developer ensure that the project is designed and constructed in a manner that minimizes potential environmental impacts?
- 6. Will the developer consider conducting additional outreach or engagement efforts to solicit input from potentially affected communities and stakeholders as the project moves forward?
- 7. How will the developer address any potential conflicts between the proposed project and existing land uses or community plans in the surrounding area?
- 8. Are there any unique or sensitive environmental features in the project area that will require special consideration or mitigation measures during project design and construction?
- 9. How will the developer ensure that the project complies with all applicable environmental regulations and permitting requirements?
- 10. Will the developer provide regular updates to the community and stakeholders regarding the progress of the environmental review process and opportunities for public input?

## Section 1.6

This type of EIR should focus primarily on the changes in the environment that would result from the development project.

- 1. Can you provide a detailed description of the project's impact on local wildlife habitats and any mitigation measures planned?
- 2. How will the development affect the air quality in the surrounding area during and after construction?
- 3. What measures are being taken to manage and mitigate noise pollution resulting from the project?
- 4. How will the project impact local water resources, including both surface water and groundwater?
- 5. Are there any anticipated effects on the soil stability and erosion in the area due to the development?
- 6. How does the project plan to address and manage waste generated during construction and operational phases?
- 7. What is the expected impact on the local vegetation, and are there any plans for reforestation or other compensatory planting?
- 8. How will the project affect the local climate or microclimate, if at all?
- 9. Are there any cultural or historical sites within the project area that might be impacted, and how will these be protected?
- 10. What steps are being taken to ensure that the development is sustainable and minimizes its carbon footprint?

#### Section 2.3

The City held a virtual EIR Public Scoping Meeting on November 2, 2022, from 6 PM to 7 PM.

- What methods were used to notify residents about the virtual EIR Public Scoping Meeting?
- 2. Were there any follow-up communications to remind residents about the meeting?
- 3. Can you provide a breakdown of the attendance numbers and demographics for the meeting?
- 4. How were the meeting details (date, time, platform) communicated to the public?
- 5. Were any alternative methods of participation offered for those who could not attend the virtual meeting?

- 6. How was feedback from the meeting documented and will it be made available to the public?
- 7. Were there any technical issues reported by attendees during the virtual meeting, and how were they addressed?
- 8. How was the effectiveness of the meeting communication strategy evaluated?
- 9. Were residents provided with materials or information in advance of the meeting to prepare them for the discussion?
- 10. Are there plans for additional public meetings or other forms of community engagement as the project progresses?

#### Section 3.2

Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

- 1. What are the specific boundaries of the project site within the Mission Grove Specific Plan area?
- 2. How does the project align with the goals and objectives of the Retail Business & Office designation?
- 3. What types of businesses or offices are anticipated to be included in the project?
- 4. What is the projected timeline for the development of the project site?
- 5. How will the project impact the existing infrastructure and public services in the area?
- 6. Are there any planned improvements to transportation or pedestrian access within the project site?
- 7. What measures will be taken to mitigate any potential environmental impacts of the project?
- 8. How will the project contribute to the local economy and job market?
- 9. What community amenities or public spaces are included in the project plan?
- 10. How will the project address sustainability and incorporate green building practices?

#### Section 3.3.5

The proposed Project includes a total of 347 studio, one-, two-, and three-bedroom residential apartment units within five, 4-story buildings. The proposed Project is anticipated to house approximately 829 tenants. 56% -1 bdrm or less, 41%- 2 bdrm, 3%- 3 bdrm

- 1. Can you provide the market data that was used to determine the mix of unit sizes for the proposed project?
- 2. How has the demand for different unit sizes changed post-COVID, and how does this affect the proposed unit mix?
- 3. What considerations were made regarding the location of the residential units within a shopping center?
- 4. How will the project address potential concerns from tenants about living in a shopping center environment?
- 5. What amenities and services will be provided to make the residential units more attractive to potential tenants?
- 6. How will parking be managed for the 829 tenants, and are there plans for dedicated residential parking?
- 7. What measures are being taken to ensure privacy and security for residents living in a shopping center?
- 8. How does the project plan to integrate residential and commercial spaces to create a balanced and cohesive community?
- 9. Are there any plans to conduct updated market research to validate the proposed unit mix?
- 10. What is the projected occupancy rate for the different unit types, and what strategies will be used to achieve these rates?

## Section 3.3.5

Parking- The Project includes 604 parking spaces in total. Of these, 513 parking spaces will be dedicated for the Proposed apartment project, and 91 will be shared between the Proposed apartment project and the existing adjacent retail site. The shared parking will be memorialized in a new covenant and restriction agreement between the residential developer entity and Mission Grove Plaza. 58 spaces are Tandem.

- 1. Can you provide the rationale behind the decision to include 58 tandem parking spaces, and how will these be allocated among tenants?
- 2. What data supports the need for 513 parking spaces within the project and the additional 91 shared spaces with the shopping center?
- 3. How will the shared parking agreement with Mission Grove Plaza be enforced to ensure availability for both residential and retail users?
- 4. What measures are being taken to discourage tenants from opting out of paying for parking and using the shopping center's parking instead?
- 5. How will the project address potential overflow parking issues that may arise due to the limited parking spaces?
- 6. Are there any plans to improve the reliability and usage of the transit corridor to reduce dependence on auto transportation?

- 7. What alternatives to traditional parking are being considered to accommodate tenants who may not own a vehicle?
- 8. How will the project ensure that the parking provided is sufficient for the needs of all tenants, especially in an area not conducive to people without auto transportation?
- 9. What impact analysis has been conducted to understand the effect of limited parking on both the residential project and the adjacent retail site?
- 10. Are there any plans to conduct a parking utilization study post-occupancy to assess the adequacy of the parking provisions and make adjustments if necessary?

## Section 3.4

- Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. Increase the type and amount of housing available consistent with the goals of the City's Housing Element.
- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
  - 1. Can you provide specific data or studies that support the projected future housing demand and how it relates to high-density urban apartments in this suburban neighborhood?
  - 2. What criteria were used to determine that this location is suitable for high-density residential development and not for continued commercial use?
  - 3. How does the proposed development align with the City's Housing Element goals, and what specific targets does it aim to meet?
  - 4. Can you provide more details on the green building practices and sustainable development methods that will be implemented in this project?

- 5. What measures will be taken to ensure that the mixed-use environment encourages walkability and integrates seamlessly with the existing community?
- 6. How will the project address concerns about the loss of commercial space and its impact on future commercial growth in the area?
- 7. What specific amenities and transit corridors are in close proximity to the proposed development, and how will they benefit the residents?
- 8. Can you provide examples of enhanced residential architecture and design elements that will be used to ensure compatibility with the surrounding residential environment?
- 9. What are the projected economic impacts of replacing commercial property with residential units on the local economy and job market?
- 10. How will the project contribute to the City's Climate Action Plan, and what measurable outcomes are expected in terms of sustainability and environmental impact?

# Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Lewis Allen 232 Bathurst Road Riverside, CA 92506

Email: LJMAllen@aol.com

Mission Grove Neighborhood Alliance

June 24, 2024

Veronica Hernandez, Senior Planner City of Riverside, Planning Division

Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR

SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 5.9.6

Due to the inconsistency of the maximum residential density, the project would result in a significant and unavoidable impact. There are no feasible mitigation measures that would reduce impacts related to inconsistency with the residential density criteria.

- 1. What specific factors contribute to the inconsistency in maximum residential density?
- 2. Has the project team explored alternative zoning or land use scenarios to address this issue?
- 3. Are there any legal or regulatory implications associated with the inconsistency in density criteria?

- 4. How does the impact of inconsistent density affect neighboring properties or communities?
- 5. Is there a threshold or benchmark for what constitutes "significant" impact in this context?
- 6. Have other similar projects faced similar challenges related to residential density?
- 7. What data or studies were used to determine that no feasible mitigation measures exist?
- 8. Are there any precedents where projects with similar density issues were successfully resolved?
- 9. How does the inconsistency impact the overall project timeline and budget?
- 10. What steps can be taken to minimize the unavoidable impact while adhering to density criteria?

# Section 5.9.6

The Project's proposed General Plan designation and zoning of Mixed Use-Urban, is consistent with surrounding development, and would assist in transitioning between commercial and single-family residential uses.

- 1. What specific criteria define the "Mixed Use-Urban" designation in the proposed General Plan?
- 2. How was the consistency with surrounding development assessed, and what metrics were used?
- 3. Are there any specific commercial or residential properties adjacent to the project site?
- 4. What benefits are expected from the proposed transition between commercial and single-family residential uses?
- 5. Has there been community input or feedback regarding this zoning designation?
- 6. Are there any potential challenges or conflicts related to the Mixed Use-Urban zoning?
- 7. How does this designation align with long-term urban planning goals for the area?
- 8. Is there a timeline for implementing this zoning change?
- 9. What studies or data support the assertion of consistency with surrounding development?
- 10. Are there any specific design guidelines or restrictions associated with Mixed Use-Urban zones?

# Section 5.11.2.4

Objective LU-22: Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port Airport, Riverside, Municipal Airport, and Flabob Airports. Policy LU-22.2: Work cooperatively with the Riverside County Airport Land Use Commission in developing, defining, implementing and protecting airport influence zones around the March Air Reserve

Base/Inland Port Airport, Riverside Municipal Airport, and Flabob Airport, and in implementing the new Airport Land Use Compatibility Plan

- 1. What specific criteria define the "March Air Reserve Base/Inland Port Airport influence zones"?
- 2. How does the new Airport Land Use Compatibility Plan address potential impacts on the long-term viability of the base and surrounding airports?
- 3. Are there any existing land use or transportation decisions that have raised concerns about viability?
- 4. What role does the Riverside County Airport Land Use Commission play in defining and implementing these influence zones?
- 5. How are the interests of both the March Air Reserve Base and the surrounding airports balanced in this process?
- 6. Have there been any past instances where land use decisions adversely affected the base or nearby airports?
- 7. What studies or assessments inform the policies outlined in Objective LU-22?
- 8. Are there specific measures in place to protect against incompatible development near the airports?
- 9. How does the cooperation between the developer and the Airport Land Use Commission occur practically?
- 10. Is there a timeline for implementing the new Airport Land Use Compatibility Plan?

The GP 2025 Land Use and Urban Design Element additionally provides a number of "smart growth" principles. A major tenet of smart growth includes focusing development in already urbanized areas of the City, rather than spreading growth to urban fringes, which reduces urban sprawl. The Smart Growth Network has defined the ten principles of smart growth:

- 1. What are the benefits of mixing land uses in urban planning?<sup>1</sup>
- 2. How does compact building design contribute to smart growth?<sup>1</sup>
- 3. Why is preserving open space important for smart growth?<sup>1</sup>
- 4. How does mixed land use enhance community vitality and security?<sup>1</sup>
- 5. What economic advantages can be gained by siting commercial areas close to residential neighborhoods?<sup>1</sup>
- 6. How does smart growth support diverse housing options?<sup>2</sup>
- 7. What role does walkability play in creating smart growth neighborhoods?<sup>2</sup>
- 8. <u>How can communities encourage more efficient use of land and resources in building design?</u><sup>1</sup>
- 9. Why is density important for viable public transit networks?1
- 10. What environmental benefits are associated with compact building design?

### Section 5.11.2.4

- 1. Mix land uses.2. Take advantage of compact building design.3. Create a range of housing opportunities and choices.4. Create walkable neighborhoods.5. Foster distinctive, attractive communities with a strong sense of place.6. Preserve open space, farmland, natural beauty and critical environmental areas.7. Strengthen and direct development toward existing communities.7. Strengthen and direct development toward existing communities.9. Make development decisions predictable, fair and cost effective.10. Encourage community and stakeholder collaboration in development decisions.
  - 1. How do you plan to integrate mixed-use development into your project, and what specific combinations of residential, commercial, and recreational spaces are you considering?
  - 2. Can you elaborate on your strategies for compact building design? How will you balance density with quality of life for residents?
  - 3. What range of housing types and price points are you including in your development to ensure diverse housing opportunities?
  - 4. What specific features are you incorporating to enhance walkability, such as pedestrian infrastructure, traffic calming measures, or strategic placement of amenities?
  - 5. How will you incorporate local cultural or historical elements into your design to create a strong sense of place unique to this community?
  - 6. What measures are you taking to preserve or enhance natural areas within or adjacent to your development? How will you balance development needs with environmental conservation?
  - 7. In what ways does your project support or revitalize existing communities nearby? Are you considering any brownfield redevelopment opportunities?
  - 8. How are you working with local authorities to streamline the development process while ensuring it remains fair and transparent?
  - 9. What methods are you using to engage the community and incorporate stakeholder feedback throughout the planning and development process? 10. How does your project address sustainability concerns, such as energy efficiency, water conservation, or resilience to climate change impacts?

# Section 5.11.6

Threshold B: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? City of Riverside General Plan 2025, Consistency with General Plan Policies

1. How does your project align with the specific land use designations outlined in the City of Riverside General Plan 2025?

- 2. Are there any aspects of your project that require variances or amendments to existing zoning ordinances? If so, what are they and how do you justify these changes?
- 3. How does your development plan address any environmental protection policies specified in the General Plan, particularly those aimed at avoiding or mitigating environmental effects?
- 4. Can you provide a detailed analysis of how your project complies with or enhances the goals set forth in any applicable specific plans for the area?
- 5. Are there any local coastal program requirements that apply to your project site? If so, how does your plan adhere to these regulations?
- 6. How does your project contribute to or align with the City's long-term vision for sustainable development as outlined in the General Plan?
- 7. Are there any potential conflicts between your proposed development and the City's policies on preserving open spaces or environmentally sensitive areas?
- 8. How does your project address any applicable policies related to traffic management, public transportation, or alternative transportation methods as outlined in the General Plan?
- 9. Can you explain how your development plan considers and incorporates any relevant historical or cultural preservation policies that may apply to the project area?
- 10. Are there any specific environmental mitigation measures required by local regulations that you've incorporated into your project design? How do these measures go beyond minimum compliance?

### Section 6.1

Several multi-family residential uses are located in Zone C2, near the Project site. There is a condominium complex, Mission Villas, located at 200 E. Alessandro Boulevard, adjacent to the Project site, across from Alessandro Boulevard. The Mission Grove Park apartments, located at 7450 Northrop Drive, are located closer to the end of Runway 14-32 than the Project. Mission Grove Park consists of 432 units and has a density of 16 dwelling units per acre. Estancia, located at 7871 Mission Grove Parkway South, consists of 208 units and has a density of 1.3 du/ac. The Project is consistent with other multi-family residential developments in the C2 Zone. Additionally, the Project consist of infill development of a commercial site. The vast majority of Zone C2 in the City of Riverside has been built out, largely by single family residences. Few infill sites, such as the Project are available for development. As such, the Project would not encourage other developments to exceed Zone C2 density standards or encroach upon MARB/IPA operations.

- 1. How does the density of your proposed project compare specifically to the Mission Grove Park apartments and Estancia developments mentioned in the EIR?
- 2. What measures are you taking to ensure compatibility with the adjacent Mission Villas condominium complex across Alessandro Boulevard?

- 3. Given that your project is an infill development in a largely built-out area, how are you addressing potential impacts on existing infrastructure and services?
- 4. Can you provide more details on how your project design considers its proximity to Runway 14-32 and any associated noise or safety concerns?
- 5. How does your project contribute to the City's goals for infill development, and what specific benefits does it bring to the area?
- 6. Are there any unique features or amenities in your project that differentiate it from other multi-family developments in Zone C2?
- 7. How have you addressed potential concerns about increased traffic or parking demands in this already developed area?
- 8. Given the project's location in Zone C2 near MARB/IPA operations, what specific design elements or operational procedures are you implementing to ensure compatibility with airport activities?
- 9. How does your project balance the need for housing with the preservation of any existing commercial uses in the area?
- 10. Can you elaborate on any sustainable or green building practices you're incorporating into this infill development, considering its urban context?

### Section 6.1

Therefore, the Project will not affect the orderly expansion of the MARB/IPA. A City Council proposed overrule of an ALUC action must provide a copy of the proposed decision and findings to both ALUC and the California Division of Aeronautics, a minimum of 45 days prior to decision to overrule ALUC. These agencies have 30 days in which to provide comments to City Council.

- 1. Can you elaborate on the specific reasons why your project will not affect the orderly expansion of the MARB/IPA (March Air Reserve Base/Inland Port Airport)?
- 2. Have you had any preliminary discussions with the Airport Land Use Commission (ALUC) regarding your project? If so, what feedback have you received?
- 3. What specific aspects of your project design or operations ensure compatibility with MARB/IPA activities?
- 4. Are there any modifications you're willing to make to your project to address potential ALUC concerns and avoid the need for a City Council overrule?
- 5. How does your project align with the current Airport Land Use Compatibility Plan for MARB/IPA?
- 6. Have you conducted any noise or safety studies related to the project's proximity to MARB/IPA? If so, what were the findings?
- 7. What is your contingency plan if the California Division of Aeronautics provides comments that are not in favor of your project?
- 8. How do you plan to address any potential concerns from current residents about increased development near MARB/IPA?

- 9. Are there any height restrictions or other development limitations due to the project's location relative to MARB/IPA, and how have you accommodated these in your design?
- 10. Have you considered any potential future expansion plans of MARB/IPA in your project design? If so, how?

### Section 6.2

ALUC: Project would result in a significant and unavoidable impact. Although implementation of the recommended conditions identified in the Riverside County Airport Land Use Commission (ALUC) Staff Report for the Project would not render the Project consistent with the MARB/IPA LUCP Compatibility Zone C2 density compatibility criteria, they would be implemented, in order to reduce the potential hazards from flight accidents to the greatest extent feasible.

- 1. Can you provide a detailed explanation of the specific conditions recommended by the ALUC Staff Report for your project?
- 2. How exactly do you plan to implement these recommended conditions, and what impact will they have on your original project design?
- 3. Given that these conditions won't make the project fully consistent with the MARB/IPA LUCP Compatibility Zone C2 density criteria, what additional measures are you considering to further mitigate potential risks?
- 4. How do you justify proceeding with the project despite the ALUC's assessment of a "significant and unavoidable impact"?
- 5. Can you elaborate on the specific ways your project exceeds the density compatibility criteria for Zone C2, and why you believe this higher density is necessary or beneficial?
- 6. What specific design features or operational procedures are you incorporating to "reduce the potential hazards from flight accidents to the greatest extent feasible"?
- 7. Have you conducted any independent risk assessments or safety studies to complement the ALUC's findings? If so, what were the results?
- 8. How do you plan to communicate the potential risks and mitigation measures to future residents or users of your development?
- 9. Are there any innovative or unconventional approaches you're considering to address the density compatibility issues while still meeting your project goals? 10. Given the ALUC's concerns, have you explored alternative locations for this project that might be more compatible with the LUCP criteria? If so, why were they deemed less suitable?

#### Section 5.14.6

Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

- 1. How does your project's proposed population density compare to the current population projections for this area in the city's general plan or other planning documents?
- 2. Can you provide specific data on the number of new residents your project is expected to bring to the area, and how this compares to the area's current population?
- 3. What analysis have you conducted to determine the impact of your project on local infrastructure, such as water supply, sewage systems, and electrical grid capacity?
- 4. How does your project align with or deviate from any existing neighborhood or community plans for this area?
- 5. Are there any aspects of your project that might indirectly encourage further development or population growth in the surrounding area? If so, how do you plan to address this?
- 6. What measures are you taking to ensure that local services (such as schools, healthcare facilities, and emergency services) can accommodate the potential population increase?
- 7. How does your project contribute to or impact the jobs-housing balance in the area? Are you proposing any commercial or business spaces along with residential units?
- 8. Have you conducted any studies on the potential impact of your project on local traffic patterns and public transportation needs? If so, what were the findings?
- 9. Are there any features of your project designed to mitigate potential negative impacts of population growth, such as green spaces, community facilities, or sustainability measures?
- 10. How does your project address affordable housing needs, if at all, and how might this impact population demographics in the area?

# **Section 5.14.6**

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040

- 1. How does your project's projected population contribution align with the city's anticipated growth of 58,445 people from 2020 to 2040?
- 2. Can you provide specific details on how your project will utilize or impact the existing services, access, and infrastructure that were planned for in the General Plan 2025?
- 3. Have you conducted any studies to determine if the current infrastructure capacity can adequately support your project, or will upgrades be necessary?
- 4. How does your project contribute to or align with the goals set forth in the 6th Cycle Housing Element?
- 5. Are there any aspects of your development that go beyond what was anticipated in the General Plan 2025? If so, how do you plan to address potential discrepancies?
- 6. Can you explain how your project might impact the city's ability to accommodate future growth beyond 2040?
- 7. What measures are you taking to ensure that your project doesn't strain existing services or infrastructure beyond what was planned for in the General Plan 2025?
- 8. How does your project contribute to a balanced distribution of population growth across the city, as envisioned in the General Plan?
- 9. Are there any innovative features in your project that could help the city better manage population growth or improve service delivery?
- 10. Given the projected population growth, how does your project address potential concerns about increased density, such as traffic congestion or loss of open space?

# **Section 5.16.4**

Project Design- Parks -The Zoning Code requires 150 square feet of common usable open space per unit for projects in the Mixed-Use – Urban Zone, for a total of 52,050 square feet of required open space. The applicant is proposing a Specific Plan Amendment to require 75 square feet of common usable open space per unit for the Mixed-Use – Urban designation, for a total of 26,025 square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres.

- 1. Can you explain in detail why you are proposing to reduce the required common usable open space from 150 to 75 square feet per unit?
- 2. How do you justify that 75 square feet of open space per unit is sufficient for the residents' needs and quality of life?
- 3. What specific amenities or features are you planning to include in the 28,611 square feet of common open space to maximize its usability and value to residents?
- 4. How does your proposed open space allocation compare to similar projects in the area or other Mixed-Use Urban developments in the city?
- 5. Have you conducted any studies or surveys to assess resident preferences or needs regarding open space in high-density urban environments?

- 6. How will the reduction in open space impact the overall environmental quality of the project, including aspects like heat island effect, stormwater management, and biodiversity?
- 7. Are you proposing any innovative design solutions to compensate for the reduced open space, such as vertical gardens, rooftop spaces, or other alternatives?
- 8. How does your proposed open space allocation align with the city's broader goals for green space and livability in urban areas?
- 9. What measures are you taking to ensure that the reduced open space doesn't negatively impact the mental and physical well-being of residents?
- 10. If the Specific Plan Amendment is not approved, how would you modify your project to meet the current requirement of 150 square feet of open space per unit?

# Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units

- 1. How did you determine that 58 dwelling units would be an appropriate number for this reduced density alternative?
- 2. How does this reduced density alternative impact the project's ability to meet local housing needs and goals?
- 3. Can you provide a comparison of the environmental impacts (e.g., traffic, noise, air quality) between the proposed 347-unit project and this 58-unit alternative?
- 4. How would the reduced density affect the economic feasibility of the project? Are there significant changes to the cost-benefit ratio?
- 5. Would the reduced density allow for any additional amenities or open space that aren't possible in the higher-density proposal?
- 6. How does this alternative align with local zoning and land use designations? Would it still require any variances or amendments?
- 7. Can you explain how this reduced density alternative would impact the project's contribution to the City's Climate Action Plan goals?
- 8. How would the architectural design and overall site layout change with this reduced density? Would it still maintain the same general character as the proposed project?
- 9. Would this alternative still be considered an efficient use of infill development, given the significant reduction in units?
- 10. How does this reduced density alternative impact the project's ability to provide affordable housing units, if any were planned in the original proposal?

Alternative 3, the Retail Development Alternative, would consist of retaining the existing retail building and associated surface parking lot with only minor improvements to the inside and/or exterior of the building and/or associated surface parking lot and landscaping. The existing building would house a permanent retail tenant utilizing the full square footage of the building for retail.

- 1. How does the potential economic impact of a full-scale retail development compare to the proposed residential project in terms of job creation and local tax revenue?
- 2. What types of minor improvements are being considered for the existing building and parking lot, and how would these impact the overall environmental footprint of the site?
- 3. How does this retail alternative align with current market demands and trends in the area? Is there a demonstrated need for additional retail space?
- 4. Can you provide a comparative analysis of the traffic impacts between this retail alternative and the proposed residential project?
- 5. How would retaining the existing building affect the site's ability to incorporate modern sustainability features or meet current energy efficiency standards?
- 6. Does this alternative align with the City's long-term vision for land use in this area, particularly given the trend towards mixed-use developments?
- 7. How would this retail alternative impact the local housing supply and the City's ability to meet its housing goals?
- 8. What would be the comparative impact on local services (e.g., schools, emergency services) between this retail alternative and the proposed residential project?
- 9. How does this alternative address or fail to address any identified community needs or preferences that were factored into the original project proposal?
  10. Given that this alternative retains the existing structure, how does it compare to the proposed project in terms of potential impacts on local character and aesthetics?

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- 1. Why was no specific off-site location considered for the proposed 347 residential apartment project?
- 2. How was the size of the potential off-site location determined for this project?
- 3. Can you provide more details on the process used to identify vacant or underutilized buildings within the City of Riverside?
- 4. What criteria were used to determine if a building or site was considered "underutilized" for this project?
- 5. How does the developer plan to address any potential environmental concerns related to the redevelopment of vacant or underutilized buildings?
- 6. What is the estimated timeline for the identification and acquisition of a suitable offsite location for this project?
- 7. How will the developer engage with the local community to gather input and address concerns related to the proposed off-site location?
- 8. Are there any zoning or land use restrictions that could impact the selection of a potential off-site location for this project?
- 9. What are the potential impacts on traffic and transportation infrastructure in the surrounding area if the project is developed at an off-site location?
- 10. How will the developer ensure that the proposed off-site location is consistent with the City of Riverside's long-term planning and development goals?

# Section 1.3

The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

- 1. How will the proposed apartment project integrate with the existing retail environment in terms of design and aesthetics?
- 2. What specific pedestrian connectivity features will be included in the project design to enhance walkability?
- 3. How will the project ensure adequate shared parking for both residential and retail uses?
- 4. What measures will be taken to minimize potential conflicts between pedestrians and vehicles in the project area?
- 5. How will the project contribute to the overall vitality and economic growth of the surrounding retail environment?
- 6. Will the project include any ground-floor retail or commercial uses to complement the existing retail environment?
- 7. How will the project address any potential noise or privacy concerns for residents living in close proximity to retail uses?
- 8. What strategies will be employed to ensure the safety and security of both residents and retail patrons within the project area?
- 9. How will the project incorporate sustainable design elements to promote environmental stewardship and reduce its carbon footprint?

10. Will the project include any public or open space amenities for use by both residents and the broader community?

# Section 1.5

The city received only one comment letter in response to the NOP and no comments during the virtual scoping meeting.

- 1. How did the city ensure that adequate notice was provided to potentially interested parties regarding the NOP and virtual scoping meeting?
- 2. What outreach efforts were made to engage potentially affected communities and stakeholders in the environmental review process?
- 3. How will the developer address potential concerns or issues that may arise during the environmental review process, given the limited public input received thus far?
- 4. Are there any specific environmental or community impacts that the developer anticipates will be raised during the environmental review process?
- 5. How will the developer ensure that the project is designed and constructed in a manner that minimizes potential environmental impacts?
- 6. Will the developer consider conducting additional outreach or engagement efforts to solicit input from potentially affected communities and stakeholders as the project moves forward?
- 7. How will the developer address any potential conflicts between the proposed project and existing land uses or community plans in the surrounding area?
- 8. Are there any unique or sensitive environmental features in the project area that will require special consideration or mitigation measures during project design and construction?
- 9. How will the developer ensure that the project complies with all applicable environmental regulations and permitting requirements?
- 10. Will the developer provide regular updates to the community and stakeholders regarding the progress of the environmental review process and opportunities for public input?

#### Section 1.6

This type of EIR should focus primarily on the changes in the environment that would result from the development project.

- 1. Can you provide a detailed description of the project's impact on local wildlife habitats and any mitigation measures planned?
- 2. How will the development affect the air quality in the surrounding area during and after construction?

- 3. What measures are being taken to manage and mitigate noise pollution resulting from the project?
- 4. How will the project impact local water resources, including both surface water and groundwater?
- 5. Are there any anticipated effects on the soil stability and erosion in the area due to the development?
- 6. How does the project plan to address and manage waste generated during construction and operational phases?
- 7. What is the expected impact on the local vegetation, and are there any plans for reforestation or other compensatory planting?
- 8. How will the project affect the local climate or microclimate, if at all?
- 9. Are there any cultural or historical sites within the project area that might be impacted, and how will these be protected?
- 10. What steps are being taken to ensure that the development is sustainable and minimizes its carbon footprint?

### Section 2.3

The City held a virtual EIR Public Scoping Meeting on November 2, 2022, from 6 PM to 7 PM.

- 1. What methods were used to notify residents about the virtual EIR Public Scoping Meeting?
- 2. Were there any follow-up communications to remind residents about the meeting?
- 3. Can you provide a breakdown of the attendance numbers and demographics for the meeting?
- 4. How were the meeting details (date, time, platform) communicated to the public?
- 5. Were any alternative methods of participation offered for those who could not attend the virtual meeting?
- 6. How was feedback from the meeting documented and will it be made available to the public?
- 7. Were there any technical issues reported by attendees during the virtual meeting, and how were they addressed?
- 8. How was the effectiveness of the meeting communication strategy evaluated?
- 9. Were residents provided with materials or information in advance of the meeting to prepare them for the discussion?
- 10. Are there plans for additional public meetings or other forms of community engagement as the project progresses?

### Section 3.2

Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

- 1. What are the specific boundaries of the project site within the Mission Grove Specific Plan area?
- 2. How does the project align with the goals and objectives of the Retail Business & Office designation?
- 3. What types of businesses or offices are anticipated to be included in the project?
- 4. What is the projected timeline for the development of the project site?
- 5. How will the project impact the existing infrastructure and public services in the area?
- 6. Are there any planned improvements to transportation or pedestrian access within the project site?
- 7. What measures will be taken to mitigate any potential environmental impacts of the project?
- 8. How will the project contribute to the local economy and job market?
- 9. What community amenities or public spaces are included in the project plan?
- 10. How will the project address sustainability and incorporate green building practices?

# Section 3.3.5

The proposed Project includes a total of 347 studio, one-, two-, and three-bedroom residential apartment units within five, 4-story buildings. The proposed Project is anticipated to house approximately 829 tenants. 56% -1 bdrm or less, 41%- 2 bdrm, 3%- 3 bdrm

- 1. Can you provide the market data that was used to determine the mix of unit sizes for the proposed project?
- 2. How has the demand for different unit sizes changed post-COVID, and how does this affect the proposed unit mix?
- 3. What considerations were made regarding the location of the residential units within a shopping center?
- 4. How will the project address potential concerns from tenants about living in a shopping center environment?
- 5. What amenities and services will be provided to make the residential units more attractive to potential tenants?
- 6. How will parking be managed for the 829 tenants, and are there plans for dedicated residential parking?
- 7. What measures are being taken to ensure privacy and security for residents living in a shopping center?

- 8. How does the project plan to integrate residential and commercial spaces to create a balanced and cohesive community?
- 9. Are there any plans to conduct updated market research to validate the proposed unit mix?
- 10. What is the projected occupancy rate for the different unit types, and what strategies will be used to achieve these rates?

## Section 3.3.5

Parking- The Project includes 604 parking spaces in total. Of these, 513 parking spaces will be dedicated for the Proposed apartment project, and 91 will be shared between the Proposed apartment project and the existing adjacent retail site. The shared parking will be memorialized in a new covenant and restriction agreement between the residential developer entity and Mission Grove Plaza. 58 spaces are Tandem.

- 1. Can you provide the rationale behind the decision to include 58 tandem parking spaces, and how will these be allocated among tenants?
- 2. What data supports the need for 513 parking spaces within the project and the additional 91 shared spaces with the shopping center?
- 3. How will the shared parking agreement with Mission Grove Plaza be enforced to ensure availability for both residential and retail users?
- 4. What measures are being taken to discourage tenants from opting out of paying for parking and using the shopping center's parking instead?
- 5. How will the project address potential overflow parking issues that may arise due to the limited parking spaces?
- 6. Are there any plans to improve the reliability and usage of the transit corridor to reduce dependence on auto transportation?
- 7. What alternatives to traditional parking are being considered to accommodate tenants who may not own a vehicle?
- 8. How will the project ensure that the parking provided is sufficient for the needs of all tenants, especially in an area not conducive to people without auto transportation?
- 9. What impact analysis has been conducted to understand the effect of limited parking on both the residential project and the adjacent retail site?
- 10. Are there any plans to conduct a parking utilization study post-occupancy to assess the adequacy of the parking provisions and make adjustments if necessary?

# Section 3.4

• Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. • Increase the type and amount of housing available consistent with the goals of the City's Housing Element.

- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
  - 1. Can you provide specific data or studies that support the projected future housing demand and how it relates to high-density urban apartments in this suburban neighborhood?
  - 2. What criteria were used to determine that this location is suitable for highdensity residential development and not for continued commercial use?
  - 3. How does the proposed development align with the City's Housing Element goals, and what specific targets does it aim to meet?
  - 4. Can you provide more details on the green building practices and sustainable development methods that will be implemented in this project?
  - 5. What measures will be taken to ensure that the mixed-use environment encourages walkability and integrates seamlessly with the existing community?
  - 6. How will the project address concerns about the loss of commercial space and its impact on future commercial growth in the area?
  - 7. What specific amenities and transit corridors are in close proximity to the proposed development, and how will they benefit the residents?
  - 8. Can you provide examples of enhanced residential architecture and design elements that will be used to ensure compatibility with the surrounding residential environment?
  - 9. What are the projected economic impacts of replacing commercial property with residential units on the local economy and job market?
  - 10. How will the project contribute to the City's Climate Action Plan, and what measurable outcomes are expected in terms of sustainability and environmental impact?

# **Summary**

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Lewis J. Allen

232 Bathurst Road Riverside, CA 92506

Email: LJMAllen@aol.com

Ten Hel

Mission Grove Neighborhood Alliance

From: Manlin pc <manlinpc@hotmail.com>
Sent: Monday, June 24, 2024 3:08 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented unbiased; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)).

- These alternative selections are not market-driven but simply as they relate to the project's significant effects. The city advocates for the project, so they will not be looking for objective and relevant alternatives unless they meet their needs. How did you determine the range of alternatives presented in the EIR, and can you provide evidence that these alternatives genuinely address the project's significant environmental effects?
- Given that the City is described as an advocate for the project, what measures have been taken to ensure an objective evaluation of alternatives that may not align with the City's preferences?
- Can you explain the process used to assess the feasibility of each alternative, particularly those that might substantially lessen environmental impacts but may not fully align with the City's goals?
- How have you incorporated public input, especially from stakeholders who may have differing views from the City, into the selection and evaluation of project alternatives?
- What criteria were used to determine that the presented alternatives would "foster informed decision-making and public participation," and how can you demonstrate that these criteria were applied objectively?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Manlin Chiu 1004 basilone dr, riversideca 92506 Name, and address Mission Grove Neighborhood Alliance

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From: Manlin pc <manlinpc@hotmail.com>
Sent: Monday, June 24, 2024 3:10 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.16.4

Project Design- Parks -The Zoning Code requires 150 square feet of common usable open space per unit for projects in the Mixed-Use – Urban Zone, for a total of 52,050 square feet of required open space. The applicant is proposing a Specific Plan Amendment to require 75 square feet of common usable open space per unit for the Mixed-Use – Urban designation, for a total of 26,025 square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres.

- Another concession, modify the Park size requirement in the Specific Plan to a much lower level from 52,050 SF down to 26,025 SF so the project qualifies. Where is all that support for high density residential housing when all the requirements must be changed. These requirements are there for a reason.
- Can you provide a detailed justification for reducing the common usable open space requirement from 150 square feet per unit to 75 square feet per unit, and explain how this reduction aligns with the overall goals of promoting high-density residential housing while maintaining quality of life for residents?
- What specific studies or data have you used to determine that 75 square feet of common usable open space per unit is sufficient for the well-being and recreational needs of the residents in this high-density development?
- How do you plan to mitigate the potential negative impacts of reducing the open space requirement by nearly 50%, particularly in terms of resident health, community interaction, and overall livability of the development?
- Can you provide examples of similar high-density residential projects where reduced open space requirements have been successfully implemented without compromising the quality of life for residents?
- Given that these requirements are in place for specific reasons, what additional amenities or design features do you propose to compensate for the significant reduction in common usable open space, and how will these ensure that the project still meets the intent of the original requirements?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Manlin Chiu; 1004 basilone dr; riverside; ca 992506 Name, and address Mission Grove Neighborhood Alliance

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From: Mariah Rojas <mariah22.r@gmail.com>
Sent: Monday, June 24, 2024 10:57 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 4.3

Developments Considered in Cumulative Impact Analysis Total of six (6) developments • One residential development with 54 residential dwelling units • Three commercial developments • Two distribution warehouses • Meridian Specific Plan – West Campus Upper Plateau Project with warehouses for high-cube fulfillment and cold storage, business park office, warehouse, and mixed-use buildings, retail, and park (active and public).

- No other high density projects in the area except the new project at Van Buren and Wood Str.
- Can you provide a detailed analysis of how the proposed high-density residential project will interact with the existing and planned developments in the area, particularly the commercial and warehouse projects mentioned in the cumulative impact analysis?
- What specific measures will be taken to mitigate any potential cumulative impacts on traffic, infrastructure, and public services resulting from the combination of your project and the other developments in the area?
- How does the proposed high-density residential project align with the overall land use and development strategy for the area, given that there are no other high-density projects except the one at Van Buren and Wood Street?
- Have you conducted any studies to assess the potential economic and social impacts of introducing a high-density residential project in an area predominantly characterized by commercial and warehouse developments?
- Can you provide examples of similar areas where high-density residential projects have been successfully integrated with commercial and warehouse developments, and what lessons from those projects will be applied to ensure the success of this proposed development?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance Alexis Rojas 909-228-2401 mariah19.r@gmail.com mariah@scbehaviorconsultants.com From: Mariah Rojas <mariah22.r@gmail.com>
Sent: Monday, June 24, 2024 11:01 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

My concerns: traffic increase, street parking increase, and schools. Our local schools are impacted as is, how will 600+ units help with this? Also, there was a request for 15% less parking spaces required per the dwelling numbers. This poses a major issue with parking that is already limited in the area.

Alexis Rojas 909-228-2401 mariah19.r@gmail.com mariah@scbehaviorconsultants.com From: Marie Moreno Myers <mmmcatchup@gmail.com>

**Sent:** Sunday, June 23, 2024 3:45 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040.

- There is no evidence to support this statement. The City cannot and does not maintain the current infrastructure and provide adequate services. If the growth rate is estimated to be 3,000 per year from 2020 to 2040, then why the RHNA commitment for 20,000 housing units by 2029.
- Can you provide detailed evidence and data to support the statement that the General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access, and infrastructure, particularly in light of current infrastructure and service challenges?
- How do you reconcile the estimated annual growth rate of 3,000 people per year from 2020 to 2040 with the RHNA commitment for 20,000 housing units by 2029, and what specific strategies will be implemented to meet this housing target?
- What measures are being taken to ensure that the existing infrastructure and services can be upgraded or expanded to support the projected population growth and the additional housing units required by the RHNA commitment?
- Can you provide a comprehensive analysis of the current state of infrastructure and services in the City of Riverside, including any identified deficiencies, and how these will be addressed to support future growth?
- How will the proposed project contribute to meeting the RHNA commitment, and what specific steps will be taken to ensure that the development aligns with the broader goals and requirements of the General Plan 2025 and the 6th Cycle Housing Element?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,
Marie Moreno Myers

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

Sent from my iPhone

From: Marie Moreno Myers <mmmcatchup@gmail.com>

**Sent:** Sunday, June 23, 2024 3:42 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

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More specifically, I would like to comment on the following sections related to the EIR:

#### Section 3.2

The current land use of the project site is a vacant retail site. The General Plan designation for the project site is C - Commercial and it is currently zoned as CR-SP - Commercial Retail and Specific Plan (Mission Grove) Overlay Zones. The site is designated as Retail Business & Office within the Mission Grove Specific Plan.

- No supporting market data that indicates the Land Use, Zoning, General Plan and Specific Plan should be abandoned.
- Can you provide detailed market data and analysis that supports the need for changing the current land use, zoning, General Plan, and Specific Plan designations from Commercial to Mixed Use-Urban?
- What specific factors or trends in the local real estate market indicate that the current commercial designation is no longer viable or appropriate for the project site?
- How does the proposed change in land use and zoning align with the broader goals and objectives of the Mission Grove Specific Plan and the City of Riverside's General Plan?
- Have you conducted any feasibility studies or economic impact assessments to compare the potential benefits and drawbacks of maintaining the site as a commercial retail space versus redeveloping it for mixed-use or residential purposes?
- What community engagement or consultation processes have been undertaken to gather input from local residents and stakeholders regarding the proposed changes, and how have their concerns and suggestions been addressed in the project planning?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

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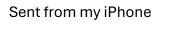
the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

# **Marie Moreno Myers**

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance



From: Marie Moreno Myers <mmmcatchup@gmail.com>

**Sent:** Sunday, June 23, 2024 3:41 PM

To: Hernandez, Veronica

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EIR, SCH # 2022100610

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 3.0

- General Plan Amendment (GPA) to change the General Plan Land Use Designation from C Commercial to MU-U Mixed Use-Urban, to allow residential land use. Zoning Code Amendment (RZ) to change the zoning from CR-SP Commercial Retail and Specific Plan (Mission Grove) Overlay Zones to MU-U-SP Mixed Use-Urban and Specific Plan (Mission Grove) Overlay Zones. Specific Plan Amendment (SPA) to revise the Mission Grove Specific Plan.
- Tentative Parcel Map (TPM) 38598 to subdivide the existing Parcel 1 of Parcel Map 26320 into two parcels for financing and conveyance purposes.
- Design Review (DR) for the proposed site design and building elevations.
- Environmental Impact Report (EIR) for the preparation of an Environmental Impact Report for the proposed Project.
- Airport Land Use Commission (ALUC) determination of consistency or inconsistency with applicable airport land use compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP).
- These Actions are a drastic abandonment of the current requirements established years ago to protect the neighborhood and ensure community continuity. No data or research has been provided that shows viable reasons for discarding these effective requirements. The proposed project is for a high density apartment project, not a mixed use building. Mixed use requires 80% of the ground floor to be offered as Commerical, Retail or Office space. This project does not match the zoning change.
- Can you provide detailed data or research that supports the need for changing the General Plan Land Use Designation from Commercial to Mixed Use-Urban, and how this change will benefit the community?
- How does the proposed high-density apartment project align with the requirements for mixed-use zoning, particularly the stipulation that 80% of the ground floor be dedicated to commercial, retail, or office space?
- What specific measures will be taken to ensure that the proposed project does not negatively impact the neighborhood's character and continuity, which were protected by the original zoning requirements?
- Have you conducted any studies or analyses to determine the potential impacts of the proposed zoning changes on local traffic, infrastructure, and public services, and if so, what were the findings?
- How does the proposed project address the compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, and what steps will be taken to mitigate any identified inconsistencies?

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More specifically, I would like to comment on the following sections related to the EIR: Section 3.3.5

Parking-The Project includes 604 parking spaces in total. Of these, 513 parking spaces will be dedicated for the Proposed apartment project, and 91 will be shared between the Proposed apartment project and the existing adjacent retail site. The shared parking will be memorialized in a new covenant and restriction agreement between the residential developer entity and Mission Grove Plaza. 58 spaces are Tandem.

- Only 513 parking spaces within the project and 58 of those are tandem spaces. 91 shared spaces with the shopping center. There is no support for this many parking spaces. The area is not conducive to people without auto transportation. The transit corridor is not reliable and not widely used. There is no support for this limited parking and the tenants can opt out of paying for parking and simply use the shopping center. This is has not been examined adequately.
- Can you provide detailed data or studies that support the adequacy of 513 parking spaces for the proposed apartment project, including the 58 tandem spaces, given the area's reliance on auto transportation and the unreliability of the transit corridor?
- How do you plan to enforce the covenant and restriction agreement to ensure that tenants do not opt out of paying for parking and instead use the shopping center's parking spaces, potentially causing parking shortages for retail customers?
- What measures will be taken to address potential overflow parking issues, particularly during peak shopping hours, given that 91 parking spaces are shared between the residential project and the adjacent retail site?
- Have you conducted any traffic and parking studies to assess the impact of the proposed parking arrangement on the surrounding area, and if so, what were the findings and recommendations?
- Can you provide examples of similar mixed-use developments where a comparable parking strategy has been successfully implemented, and what lessons from those projects will be applied to ensure the success of this proposed parking plan?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

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**Marie Moreno Myers** 

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 3:40 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR: Section 3.3.5

The proposed Project includes a total of 347 studio, one-, two-, and three-bedroom residential apartment units within five, 4-story buildings. The proposed Project is anticipated to house approximately 829 tenants. 56% -1 bdrm or less, 41%- 2 bdrm, 3%- 3 bdrm

- This mix of unit sizes is not supported by market data. This is based on data long before Covid at it assumes people want to live in a shopping center and occupy a majority of 1 bedrooms.
- Can you provide updated market data, including post-COVID trends, that supports the proposed mix of unit sizes (56% one-bedroom or less, 41% two-bedroom, and 3% three-bedroom) for the residential apartment units?
- How did you determine the demand for one-bedroom units in a shopping center environment, and what evidence do you have that this demand remains strong in the current market?
- Have you conducted any recent surveys or studies to understand the preferences of potential tenants regarding living in a mixed-use development within a shopping center, and if so, what were the findings?
- What contingency plans do you have in place if the demand for one-bedroom units does not meet expectations, and how will you adapt the project to address potential vacancies?
- Can you provide examples of similar mixed-use developments where a high percentage of one-bedroom units have been successful, and what lessons from those projects are being applied to ensure the success of this proposed project?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

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7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 3:40 PM

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EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.2

Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

- No market data has been presented to support changing this area designation to Residential.
- Can you provide comprehensive market data and analysis that justifies changing the area designation from Retail Business & Office to Residential, particularly considering the site's central location within the Specific Plan area?
- How does the proposed residential development align with the original intent and goals of the Mission Grove Specific Plan, and what specific benefits will it bring to the area that the current Retail Business & Office designation does not?
- Have you conducted any studies to assess the potential economic impact of removing retail and office space from this central location, and if so, what were the findings?
- What measures do you propose to ensure that the loss of potential retail and office space in this area won't negatively impact local employment opportunities or the overall economic balance of the Mission Grove area?
- Can you provide examples of similar successful conversions from Retail Business & Office to Residential in comparable specific plan areas, and what lessons from those projects can be applied to ensure the success of this proposed change?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

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More specifically, I would like to comment on the following sections related to the EIR: Section 2.3

The City held a virtual EIR Public Scoping Meeting on November 2, 2022, from 6 PM to 7 PM.

- No data has been provided on how this meeting was communicated and how many residents attended.
- Can you provide detailed information on the methods used to communicate the virtual EIR Public Scoping Meeting to the community, including the platforms and channels used for notification?
- How many residents attended the virtual EIR Public Scoping Meeting on November 2, 2022, and can you provide a summary of the key concerns or comments raised during the meeting?
- What steps were taken to ensure that all potentially affected residents were informed about the meeting, and how did you address any barriers to participation, such as digital access or language differences?
- Can you provide data on the overall community engagement efforts for this project, including the number of comments received, the demographic breakdown of participants, and any follow-up actions taken in response to community feedback?
- How do you plan to improve future community engagement efforts to ensure broader and more effective participation, particularly for residents who may have been unaware of or unable to attend the initial virtual scoping meeting?

# Summary

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More specifically, I would like to comment on the following sections related to the EIR: Section 1.6

This type of EIR should focus primarily on the changes in the environment that would result from the development project.

- The report should be unbiased and not show that it is promoting the project in any way. This EIR is a marketing report for the project emphasizing support for the project continually.
- Can you provide specific examples of how the EIR maintains objectivity in its analysis, particularly in sections where potential negative impacts are discussed?
- What measures were taken during the EIR preparation process to ensure an unbiased assessment of environmental impacts, rather than promoting the project?
- How does the EIR balance the presentation of potential benefits and drawbacks of the project, and can you point to specific sections that demonstrate this balance?
- Were any independent third-party reviewers involved in the EIR process to ensure objectivity, and if so, can you share their findings or recommendations?
- Given the concern that the EIR appears to be promoting the project, what steps are you willing to take to address this perception and ensure a more neutral presentation of environmental impacts?

# Summary

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 1.5

The city received only one comment letter in response to the NOP and no comments during the virtual scoping meeting.

- Adequate notice was not provided by the City and/or developer. The communication might have met the laws minimum requirements but obviously that is not adequate.
- Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change?
- How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential?
- Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed for car-dependent retail?
- What specific shared elements, including parking, are planned between the residential and retail components, and how will these be implemented without negatively impacting the existing retail operations?
- Given that the project will replace a portion of a commercial facility designed to support the neighborhood, how do you plan to mitigate the potential loss of retail services and ensure that the new development still meets the community's needs?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

### **Marie Moreno Myers**

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 3:39 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 1.3

The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

- This is an unsupported statement that makes unsupported assumptions. This is a proposed apartment building that will replace a large portion of a commercial facility that was designed to support the neighborhood. There is no market data to support this project.
- Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change?
- How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential?
- Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed for car-dependent retail?
- What specific shared elements, including parking, are planned between the residential and retail components, and how will these be implemented without negatively impacting the existing retail operations?
- Given that the project will replace a portion of a commercial facility designed to support the neighborhood, how do you plan to mitigate the potential loss of retail services and ensure that the new development still meets the community's needs?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

# **Marie Moreno Myers**

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 3:38 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Alternative Uses - Section 7.0.3

The No Project alternative would not fulfill any of the Project's objectives as the existing site would not provide high-quality housing in close proximity to many amenities and high-quality transit corridors, assist the City of Riverside in meeting housing needs, use land resources more efficiently with infill redevelopment on an underutilized vacant site; or further the City's Climate Action Plan by replacing aging building construction with green building practices and other sustainable development methods. Under this alternative, no improvements would be made to the Project site, and the site would continue to be vacant with temporary/seasonal retail tenants.

- This assumes the property will remain as-is and is only used for temporary retail with no desire for a permanent tenant.
- Have you conducted any market studies or feasibility analyses to determine the potential for attracting permanent retail tenants to the existing site rather than assuming it will only be used for temporary/seasonal retail?
- What specific green building practices and sustainable development methods are you proposing that would significantly contribute to the City's Climate Action Plan goals?
- Can you provide a comparative analysis of how your proposed high-quality housing development would more effectively meet the city's housing needs than other potential uses for the site?
- How does your project's proximity to high-quality transit corridors specifically translate into reduced environmental impacts compared to the No Project alternative?
- Given that the site is described as "underutilized," have you explored any alternative development scenarios that could achieve similar objectives while preserving some existing structures or uses?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

*Marie Moreno Myers* 7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 3:45 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.14.6

Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

- Yes, the project could have as many as 6 people in a one bedroom, potentially doubling the projected occupancy of 839 to over 1600, the population implications have not considered this issue as it relates to the local community of Mission Grove with less than 8000 residents. It's the unplanned population growth to the local community that has not been examined.
- Can you provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit?
- How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections?
- What measures will be implemented to monitor and manage the actual occupancy rates of the residential units to ensure they align with the projected numbers and do not lead to unplanned population growth?
- Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents?
- Can you provide examples of similar projects where unplanned population growth was effectively managed, and what strategies from those projects will be applied to mitigate potential impacts in Mission Grove?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

**Marie Moreno Myers** 

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 3:37 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.2

State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)).

- These alternative selections are not market-driven but simply as they relate to the project's significant effects. The city advocates for the project, so they will not be looking for objective and relevant alternatives unless they meet their needs. How did you determine the range of alternatives presented in the EIR, and can you provide evidence that these alternatives genuinely address the project's significant environmental effects?
- Given that the City is described as an advocate for the project, what measures have been taken to ensure an objective evaluation of alternatives that may not align with the City's preferences?
- Can you explain the process used to assess the feasibility of each alternative, particularly those that might substantially lessen environmental impacts but may not fully align with the City's goals?
- How have you incorporated public input, especially from stakeholders who may have differing views from the City, into the selection and evaluation of project alternatives?
- What criteria were used to determine that the presented alternatives would "foster informed decision-making and public participation," and how can you demonstrate that these criteria were applied objectively?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

# **Marie Moreno Myers**

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 11:13 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

#### Dear Ms. Hernandez:

I urge you to take our community concerns and legal concerns seriously. I also thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0

The following discussion considers alternatives to implementing the Project and examines the potential environmental impacts resulting from each alternative. By comparing these alternatives to the Project, the relative advantage(s) can be weighed and analyzed.

- These alternatives are not based on any feasibility study, local market analysis, or other independent studies to support the statements or conclusions. Studies have shown that only a tiny percentage of old KMARTS are demolished and replaced with residential housing.
- Can you provide specific feasibility studies or local market analyses supporting the viability of converting this KMART site into residential housing?
- What percentage of similar KMART conversions to residential housing have been successful in comparable markets, and how does this inform your project's potential success?
- Have you conducted any environmental impact assessments to compare the effects of demolition and new construction versus adaptive reuse of the existing KMART structure?
- Given that studies show only a tiny percentage of old KMARTs are demolished for residential use, what unique factors make this site suitable for such a conversion?
- How does your proposed residential development align with the local community's long-term urban planning goals and housing needs, and can you provide data to support this alignment?

•

Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

# Marie Moreno Myers

7186 Stanhope Lane Riverside, CA 92506 Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 3:44 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.9.6

March Air Reserve Base/United States Air Force Input -On July 31, 2023, the Air Force provided comments supporting ALUC's recommendation of inconsistency due to concerns with the project's inconsistent density.

- MARB does not support this project.
- Given that the proposed density of 35 du/ac significantly exceeds both the ALUC maximum of 6 du/ac for Zone C2 and the area's historical maximum of 16 du/ac, what specific justifications can you provide for proposing such a dramatic increase in density?
- Have you conducted any studies or analyses to assess the potential impacts of this substantial density increase on local infrastructure, traffic patterns, and community services?
- How do you plan to address potential safety concerns related to the project's non-compliance with ALUC density requirements, particularly given its proximity to March Air Reserve Base?
- Can you provide examples of similar successful projects that have received approval for such significant deviations from ALUC requirements, and explain how those precedents might apply to this case?
- What specific mitigation measures or design features are you proposing to offset the potential negative impacts of exceeding the ALUC density requirements by such a large margin?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

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To: Hernandez, Veronica

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.9.6

Riverside County ALUC Consistency with MARB/IPA Analysis and Findings - The Project's proposed residential density of 35.0 du/ac exceeds the maximum allowable residential density for Zone C2 of 6.0 du/ac.

- Nothing supports a project this far removed from the ALUC requirements. 35 units compared to 6 units is not even close. Why was this even proposed? The area has never exceeded 16 du/ac.
- Given that the proposed density of 35 du/ac significantly exceeds both the ALUC maximum of 6 du/ac for Zone C2 and the area's historical maximum of 16 du/ac, what specific justifications can you provide for proposing such a dramatic increase in density?
- Have you conducted any studies or analyses to assess the potential impacts of this substantial density increase on local infrastructure, traffic patterns, and community services?
- How do you plan to address potential safety concerns related to the project's non-compliance with ALUC density requirements, particularly given its proximity to March Air Reserve Base?
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Sincerely,

Marie Moreno Myers 7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

From: Marie Moreno Myers <mmmcatchup@gmail.com>

**Sent:** Sunday, June 23, 2024 3:44 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 3.3.2

The proposed Project includes a Zoning Code Amendment (RZ) to change the existing zoning of the project site from CR-SP Commercial Retail and Specific Plan (Mission Grove) Overlay Zones to MU-U-SP – Mixed Use-Urban and Specific Plan (Mission Grove) Overlay Zones.

- All these zoning requirements have been in place for a reason, so the community thrives and attracts new residents with a carefully designed structure and purpose that promotes safety, security and a quality of life. All these necessary changes shows no support for improving the community.
- Can you provide specific evidence or studies that demonstrate how the proposed Zoning Code Amendment from Commercial Retail to Mixed Use-Urban will enhance the safety, security, and quality of life for current and future residents of the community?
- What measures will be taken to ensure that the proposed zoning changes do not negatively impact the existing community structure and purpose that have been carefully designed to promote thriving neighborhoods?
- How does the proposed project plan to address potential concerns from residents regarding the integration of high-density residential units into an area currently zoned for commercial retail, particularly in terms of maintaining community cohesion and character?
- Can you provide detailed plans or examples of similar projects where a transition from Commercial Retail to Mixed Use-Urban zoning has successfully improved the community, and what lessons from those projects will be applied here?
- What specific benefits does the proposed Zoning Code Amendment offer to the existing community, and how do these benefits outweigh the potential negative impacts identified in the EIR, particularly in terms of traffic, parking, and overall community integration?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

**Marie Moreno Myers** 

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

From: Marie Moreno Myers <mmmcatchup@gmail.com>

**Sent:** Sunday, June 23, 2024 3:43 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 3.3.1

The proposed Project includes a General Plan Amendment (GPA) to change the existing General Plan Land Use Designation of the project site from C - Commercial to MU-U - Mixed Use-Urban, to allow residential land use.

- This is not an urban area and the proposed project is not Mixed Use.
- Can you provide specific examples or case studies where similar suburban areas have successfully transitioned to Mixed Use-Urban designations, and how those transitions impacted the local community and environment?
- What specific elements of the proposed project will ensure that it meets the criteria for Mixed Use-Urban zoning, particularly in terms of integrating residential and commercial uses in a way that benefits the community?
- How does the proposed project plan to address potential increases in traffic and parking demands, given that the area is not currently designed to support high-density residential use?
- Can you provide detailed plans or designs that demonstrate how the proposed project will integrate residential and commercial elements to create a true mixed-use environment, rather than just a high-density residential project?
- What specific benefits does the proposed General Plan Amendment and zoning change offer to the existing community, and how do these benefits outweigh the potential negative impacts identified in the EIR?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 3.2.2

The site is bordered on the north, west, and east (across Mission Grove Parkway) by the Mission Grove Plaza Shopping Center, which has a General Plan Land Use Designation of C - Commercial and is zoned CR-SP - Commercial Retail and Specific Plan (Mission Grove) Overlay Zones, and is developed with retail uses. Multi-family residences are located further north (across Alessandro Boulevard), which have a General Plan Land Use Designation of HDR – High-Density Residential, and are zoned R-3-3000-SP – Multi-Family Residential and Specific Plan (Mission Grove) Overlay Zones. The project site is bordered on the south by a single-family residential neighborhood (across Mission Village Drive), which has a General Plan Land Use Designation of Medium High Density Residential (MHDR) and is zoned R-1-7000-SP – Single-Family Residential and Specific Plan (Mission Grove) Overlay Zones.

- No market studies, supply and demand analysis or other data has been provided to support a High Density residential property being dropped into a retail shopping center in a suburban neighborhood with nothing nearby even close to the density levels being proposed is going to improve the area. Not to mention the impacts of traffic and parking.
- Can you provide detailed market studies and supply/demand analyses that specifically justify the need for high-density residential development within this existing retail-focused area?
- How do you plan to mitigate the potential impacts on traffic and parking, given that the proposed high-density residential project will be situated in a primarily retail and lower-density residential area?
- What specific measures will be implemented to ensure a smooth transition between the proposed high-density development and the surrounding lower-density residential and commercial areas?
- Have you conducted any community impact assessments to determine how the introduction of a high-density residential property might affect the character and functionality of the existing suburban neighborhood?
- Given the significant difference in density between the proposed project and the surrounding areas, what specific benefits do you anticipate this development will bring to the existing community that outweigh potential negative impacts?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

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Sincerely,

# **Marie Moreno Myers**

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

From: Marie Moreno Myers <mmmcatchup@gmail.com>

**Sent:** Sunday, June 23, 2024 3:42 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.2

Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

- No market data has been presented to support changing this area designation to Residential.
- Can you provide comprehensive market data and analysis that justifies changing the area designation from Retail Business & Office to Residential, particularly considering the site's central location within the Specific Plan area?
- How does the proposed residential development align with the original intent and goals of the Mission Grove Specific Plan, and what specific benefits will it bring to the area that the current Retail Business & Office designation does not?
- Have you conducted any studies to assess the potential economic impact of removing retail and office space from this central location, and if so, what were the findings?
- What measures do you propose to ensure that the loss of potential retail and office space in this area won't negatively impact local employment opportunities or the overall economic balance of the Mission Grove area?
- Can you provide examples of similar successful conversions from Retail Business & Office to Residential in comparable specific plan areas, and what lessons from those projects can be applied to ensure the success of this proposed change?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

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From: Marie Moreno Myers <mmmcatchup@gmail.com>

**Sent:** Sunday, June 23, 2024 3:42 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 3.2.2

The project includes a General Plan Amendment to change the General Plan Land Use Designation from C – Commercial to MU-U – Mixed-Use – Urban, to allow the residential land use. A Zone Change is also proposed from CR – Commercial Retail – to MU-U – Mixed-use Urban. Mixed Use-Urban zoning has been selected for this site to bring together medium- to high-density residential and retail development in a mixed use environment. The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking. The existing and proposed General Plan Land Use Designations and zoning are shown in Figure 3.0-4 General Plan Land Use Map and Figure 3.0-5 Zoning, respectively.

- This is not an Urban area, it is suburban neighborhood with commercial and retail services to support the community. This project will allow a high density residential project to be dropped in the middle of a retail shopping center in which there is no data to support any additional integration of features. It shows the project will disrupt the flow of traffic, create parking problems and no positive shared elements. The EIR statements are biased and in favor of the project.
- Can you provide specific data and analysis demonstrating how the proposed high-density residential project will integrate successfully with the existing suburban retail environment, particularly in terms of traffic flow and parking?
- What concrete evidence do you have to support the claim that this project will enhance pedestrian connectivity and walkability in an area primarily designed for car-dependent retail?
- How does the proposed Mixed Use-Urban designation align with the broader community planning goals for this suburban neighborhood, and what studies have been conducted to assess its impact on the existing community character?
- Can you provide detailed traffic impact studies that specifically address how the introduction of high-density residential units will affect traffic patterns and congestion in the surrounding retail areas?
- What specific shared elements are planned between the residential and retail components, and how will these be implemented to ensure they genuinely benefit both the new residents and existing retail businesses without disrupting current operations?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with

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7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

From: Marie Moreno Myers <mmmcatchup@gmail.com>

**Sent:** Sunday, June 23, 2024 3:45 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.16.4

Project Design- Parks -The Zoning Code requires 150 square feet of common usable open space per unit for projects in the Mixed-Use – Urban Zone, for a total of 52,050 square feet of required open space. The applicant is proposing a Specific Plan Amendment to require 75 square feet of common usable open space per unit for the Mixed-Use – Urban designation, for a total of 26,025 square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres.

- Another concession, modify the Park size requirement in the Specific Plan to a much lower level from 52,050 SF down to 26,025 SF so the project qualifies. Where is all that support for high density residential housing when all the requirements must be changed. These requirements are there for a reason.
- Can you provide a detailed justification for reducing the common usable open space requirement from 150 square feet per unit to 75 square feet per unit, and explain how this reduction aligns with the overall goals of promoting high-density residential housing while maintaining quality of life for residents?
- What specific studies or data have you used to determine that 75 square feet of common usable open space per unit is sufficient for the well-being and recreational needs of the residents in this high-density development?
- How do you plan to mitigate the potential negative impacts of reducing the open space requirement by nearly 50%, particularly in terms of resident health, community interaction, and overall livability of the development?
- Can you provide examples of similar high-density residential projects where reduced open space requirements have been successfully implemented without compromising the quality of life for residents?
- Given that these requirements are in place for specific reasons, what additional amenities or design features do you propose to compensate for the significant reduction in common usable open space, and how will these ensure that the project still meets the intent of the original requirements?

## Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

# Sincerely,

# **Marie Moreno Myers**

7186 Stanhope Lane Riverside, CA 92506 mmmcatchup@gmail.com Mission Grove Neighborhood Alliance

From: Martin Diaz <m802boy@yahoo.com>
Sent: Monday, June 24, 2024 1:45 PM

To: Hernandez, Veronica Cc: Martin Number

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner Cityof Riverside, Planning Division Email: VHernandez@riversideca.gov

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More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.5

Alternative 3, the Retail Development Alternative, would consist of retaining the existing retail building and associated surface parking lot with only minor improvements to the inside and/or exterior of the building and/or associated surface parking lot and landscaping. The existing building would house a permanent retail tenant utilizing the full square footage of the building for retail.

- Have you conducted a comprehensive market analysis to determine the viability of attracting a large-scale retail tenant for the entire building, and if so, what were the key findings?
- How does the potential economic impact of retaining the site as retail compare to your proposed residential development regarding job creation, local tax revenue, and overall community benefit?
- If selling the property to a retailer is considered, what criteria would you use to ensure the new owner's plans align with the city's long-term development goals and the needs of the surrounding community?
- Have you explored any mixed-use alternatives that could incorporate retail and residential components, potentially preserving some of the existing structure while addressing housing needs?
- Given the trend of repurposing retail spaces for alternative uses, as mentioned in the search results, what innovative approaches have you considered for this site beyond traditional retail or residential development?

# Summary

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Thank you for your consideration of this letter.

Sincerely,

Martin Diaz 263 Cannon Rd, Riverside CA 92506 Mission Grove Neighborhood Alliance

From: MARUTA RATERMAN <maruraterm@aol.com>

**Sent:** Sunday, June 23, 2024 9:33 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR:

**Section 5.17.5** 

Parking - Unbundle Residential Parking Costs from Property Cost. According to CAPCOA, increasing the cost of owning a vehicle will decrease or discourage vehicle ownership and therefore reduce VMT and GHG. CAPCOA transportation Measure T-16, Unbundle Residential Parking Costs from Property Cost, was used to estimate the amount of VMT reduction that can be achieved by charging for additional parking stalls. The Project proposes to provide 1 parking stall to every apartment unit within the rental unit fee (no additional charge) and charge \$75 per month for any and each additional parking spaces, which may reduce Project VMT by up to 3.9%.

- This section appears to be in violation of AB 1317 signed into law in 2023 and effective in January 2025 with any new certificate of occupancy, requires that all parking be unbundled and charged for separately. With this project being in the middle of a shopping center, not providing enough parking for the number of units, and the tenants being able to opt out of paying for parking since the shopping center parking is free, creates numerous issues for the retail establishments and their customers. This is especially true since occupancy standards allow for up to 6 people in a one bedroom. None of this has been addressed in this report.
- How do you plan to comply with AB 1317, which requires all parking to be unbundled and charged for separately starting in January 2025, given that your current proposal includes one parking stall per apartment unit within the rental fee?
- What specific measures will be implemented to prevent tenants from opting out of paying for parking and instead using the free parking available in the shopping center, potentially causing parking shortages for retail customers?
- Can you provide a detailed analysis of the potential impacts on retail establishments and their customers if tenants use the shopping center parking, including any mitigation strategies to address these issues?
- How do you plan to address the potential for high occupancy rates (up to 6 people in a one-bedroom unit) and the resulting increased demand for parking, which may exceed the provided parking capacity?
- Have you conducted any studies or assessments to evaluate the effectiveness of unbundling residential parking costs in reducing VMT and GHG emissions, and how do these findings support the proposed parking strategy for this project?

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Thank you for your consideration of this letter.

Sincerely, MARUTA Raterman 5544 Inner Circle Dr Riverside Ca 92506 Name, and address Mission Grove Neighborhood Alliance

From: MARUTA RATERMAN <maruraterm@aol.com>

**Sent:** Sunday, June 23, 2024 9:11 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

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More specifically, I would like to comment on the following sections related to the EIR: Section 5.1.1

Aesthetics-Setting: Although the majority of the City is urbanized

- This is not true and no evidence has been provided to support this statement.
- Can you provide specific data or studies that support the claim that the majority of the City is urbanized? What metrics or criteria were used to make this determination?
- How do you define "urbanized" in the context of this project, and what percentage of the City meets this definition according to your analysis?
- Have you conducted a comprehensive land use survey of the City to verify the extent of urbanization? If so, can you share the methodology and results?
- How does the level of urbanization in the immediate project area compare to other parts of the City, and how might this impact the project's compatibility with its surroundings?
- Given that the statement about urbanization has been challenged, how does this affect your overall assessment of the project's aesthetic impacts, particularly in terms of its compatibility with the existing visual character of the area?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,
MARUTA Raterman
5544 Inner Circle Dr
Riverside Ca 92506
Name, and address
Mission Grove Neighborhood Alliance

From: MARUTA RATERMAN <maruraterm@aol.com>

**Sent:** Sunday, June 23, 2024 9:08 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 4.3

Developments Considered in Cumulative Impact Analysis Total of six (6) developments • One residential development with 54 residential dwelling units • Three commercial developments • Two distribution warehouses • Meridian Specific Plan – West Campus Upper Plateau Project with warehouses for high-cube fulfillment and cold storage, business park office, warehouse, and mixed-use buildings, retail, and park (active and public).

- No other high density projects in the area except the new project at Van Buren and Wood Str.
- Can you provide a detailed analysis of how the proposed high-density residential project will interact with the existing and planned developments in the area, particularly the commercial and warehouse projects mentioned in the cumulative impact analysis?
- What specific measures will be taken to mitigate any potential cumulative impacts on traffic, infrastructure, and public services resulting from the combination of your project and the other developments in the area?
- How does the proposed high-density residential project align with the overall land use and development strategy for the area, given that there are no other high-density projects except the one at Van Buren and Wood Street?
- Have you conducted any studies to assess the potential economic and social impacts of introducing a high-density residential project in an area predominantly characterized by commercial and warehouse developments?
- Can you provide examples of similar areas where high-density residential projects have been successfully integrated with commercial and warehouse developments, and what lessons from those projects will be applied to ensure the success of this proposed development?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance MARUTA Raterman 5544 Inner Circle Riverside Ca 92506

From: MARUTA RATERMAN <maruraterm@aol.com>

**Sent:** Sunday, June 23, 2024 9:05 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.4

- Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. Increase the type and amount of housing available consistent with the goals of the City's Housing Element.
- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
- This is not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likely hood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood.
- Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for high-density urban apartments in a suburban neighborhood like Mission Grove?
- How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services?
- What measures will be taken to ensure that the proposed mixed-use development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation?
- Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development?
- How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels?

### Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, MARUTA Raterman 5544 Inner Circle Dr Riverside Ca 9256 Name, and address Mission Grove Neighborhood Alliance

From: MARUTA RATERMAN <maruraterm@aol.com>

**Sent:** Sunday, June 23, 2024 9:02 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

#### Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, MARUTA Raterman 5544 Inner Circle Dr Riverside Calif 92506 Name, and address Mission Grove Neighborhood Alliance Sent from my iPhone From: MARUTA RATERMAN <maruraterm@aol.com>

**Sent:** Sunday, June 23, 2024 9:31 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

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More specifically, I would like to comment on the following sections related to the EIR:

**Section 5.17.5** 

Environmental Impacts - Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?The City's guidelines provide guidance regarding VMT analysis based on land use types.10. Implement Subsidized or Discounted Transit Program (TRT-4).In conclusion, while the previously discussed TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent, these measures would not reduce the Project-generated VMT impact to a less than significant level.

- The VMT impact cannot be mitigated.
- Given that the proposed TDM measures are insufficient to reduce the Projectgenerated VMT impact to a less than significant level, what additional innovative strategies or technologies have you considered to further mitigate VMT impacts?
- Can you provide a detailed analysis of how the 17.7 percent reduction in VMT was calculated, and what specific assumptions were made in this calculation?
- Have you explored partnerships with local transit agencies or ride-sharing companies to develop more robust transit solutions that could potentially reduce VMT beyond the current projections?
- What specific measures will be implemented to monitor and evaluate the effectiveness of the proposed TDM strategies over time, and how will these findings be used to adjust and improve VMT reduction efforts?
- Given that the VMT impact cannot be fully mitigated, how do you plan to address potential community concerns about increased traffic congestion and related environmental impacts, particularly in the context of the project's consistency with local and regional transportation plans?

#### Summary

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MARUTA Raterman
5544 Inner Circle Dr
Riverside Ca 92506
Name, and address
Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 9:28 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR:

The GP 2025 Land Use and Urban Design Element additionally provides a number of "smart growth" principles. A major tenet of smart growth includes focusing development in already urbanized areas of the City, rather than spreading growth to urban fringes, which reduces urban sprawl. The Smart Growth Network has defined the ten principles of smart growth:

- Mission Grove is not an already urbanized neighborhood. This project would be defined as spreading growth to urban fringes which is unacceptable according to these principles.
- How does the proposed project align with the smart growth principles outlined in the GP 2025 Land Use and Urban Design Element, particularly the focus on developing already urbanized areas rather than expanding into urban fringes?
- Can you provide specific examples or case studies where similar projects have successfully implemented smart growth principles in suburban or fringe areas, and what lessons from those projects will be applied here?
- What measures will be taken to ensure that the proposed development does not contribute to urban sprawl, and how will it promote sustainable growth within the existing community framework?
- How do you plan to address concerns that the project is expanding growth to urban fringes, and what specific benefits does the project offer that justify this deviation from smart growth principles?
- Have you conducted any community engagement or consultation processes to gather input from local residents and stakeholders regarding the potential impacts of the project on urban sprawl and community character, and if so, what were the findings and how have they been incorporated into the project planning?

#### Summary

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MARUTA Raterman
5544 Inner Circle Dr
Riverside Ca 92506
Name, and address
Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 9:26 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 5.9.6

The Project's proposed General Plan designation and zoning of Mixed Use-Urban, is consistent with surrounding development, and would assist in transitioning between commercial and single-family residential uses.

- This statement is misleading. It implies the project as presented is OK, even though it does not meet the ALUC requirements. It is not consistent with surrounding developments. This is another example of the EIR being used as a marketing tool for the project.
- Can you provide specific data or examples that demonstrate how the proposed Mixed Use-Urban designation is consistent with the surrounding development, given that it appears to significantly exceed both ALUC requirements and existing density levels in the area?
- How do you justify the claim that this project would assist in transitioning between commercial and single-family residential uses, considering the substantial difference in density and scale compared to existing neighborhoods?
- What specific measures or design elements are incorporated into the project to ensure a smooth transition between the proposed high-density development and the surrounding lower-density areas?
- Given that the project does not meet ALUC requirements, how do you plan to address potential safety and compatibility concerns related to its proximity to March Air Reserve Base?
- Can you provide a detailed comparison of the proposed project's density, height, and overall scale with those of the surrounding developments to substantiate the claim of consistency?

#### Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

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5544 Inner Circle Dr
Riverside ca 92506
Name, and address
Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 9:24 PM

To: Hernandez, Veronica

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EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR:

Section 5.9.6

Due to the inconsistency of the maximum residential density, the project would result in a significant and unavoidable impact. There are no feasible mitigation measures that would reduce impacts related to inconsistency with the residential density criteria.

- There is no evidence as to why the project is being considered at all based on this issue. Other than it helps meet the Cities RHNA requirements.
- Given that the project would result in a significant and unavoidable impact due to inconsistency with maximum residential density requirements, what specific justifications can you provide for pursuing this project beyond meeting the City's RHNA requirements?
- Have you explored any alternative designs or configurations that could bring the project closer to compliance with the residential density criteria while still meeting your development goals?
- Can you provide detailed analysis of how the benefits of this project, including its contribution to RHNA requirements, outweigh the significant and unavoidable impacts identified in the EIR?
- What specific measures do you propose to mitigate or offset the negative impacts of exceeding the maximum residential density, even if they cannot fully resolve the inconsistency?
- Have you conducted any studies or community engagement efforts to assess local support or opposition to this project, given its significant deviation from established density requirements?

# Summary

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Thank you for your consideration of this letter. MARUTA Raterman 5544 Inner Circle Riverside Ca 92506 Sincerely,

Name, and address Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 9:22 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR: Section 6.3.2

Commitment of Future Generations - Approval of the Project would result in environmental changes or impacts that commit future generations to new environmental circumstances. Primarily, the approval of the Project would change the underlying GP 2025 land use designations and zoning of the Project site and the Mission Grove Specific Plan land use and zoning, as detailed in Section 5.11, Land Use and Planning. The change in the underlying regulations would allow for a change from C - Commercial to MU-U - Mixed Use-Urban for a multi-family development. This would result, in turn, in an increase in population as compared to commercial development as envisioned in the City's GP 2025.

- This project would have a lasting effect on the local area for generations. It would also set a precedent that all the regulations can be waived or overwritten if the local government wants a project that does not meet the current criteria and the people affected the most by the project will struggle to be heard.
- Can you provide a detailed analysis of how the proposed change from C Commercial to MU-U Mixed Use-Urban will impact the long-term land use and zoning consistency within the Mission Grove Specific Plan and the broader GP 2025 framework?
- What specific measures will be taken to ensure that the voices and concerns of the local community, who are most affected by the project, are adequately heard and addressed throughout the planning and approval process?
- How do you plan to mitigate the potential negative impacts of increased population density on local infrastructure, public services, and community resources, given the shift from commercial to multi-family residential development?
- Can you provide examples of similar projects where changes in land use designations and zoning have been successfully implemented without setting a negative precedent for future developments, and what lessons from those projects will be applied here?
- What long-term monitoring and evaluation strategies will be put in place to assess the environmental and social impacts of the project on future generations, and how will these findings be used to inform future land use and zoning decisions?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, MARUTA Raterman 5544 Inner Circle Dr Riverside Ca 92506 Name, and address Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 9:20 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 6.3

Significant Irreversible Environmental Changes - This section addresses the use of non-renewable resources during initial and continued phases of the Project, the commitment of future generations to environmental changes or impacts because of the Project, and any irreversible damage from environmental accidents associated with the Project. Operation of the Project would irreversibly increase local demand for non-renewable energy resources, such as petroleum products and natural gas. Increasingly efficient building design, however, will offset this demand to some degree by reducing energy demands of the Project.

- The project will increase energy and utility demands.
- Can you provide a detailed analysis of the projected increase in local demand for nonrenewable energy resources, such as petroleum products and natural gas, due to the operation of the project?
- What specific measures will be implemented to ensure that increasingly efficient building designs will effectively offset the increased energy demands of the project?
- How do you plan to mitigate the long-term environmental impacts and irreversible changes associated with the increased use of non-renewable resources?
- Have you conducted any risk assessments to evaluate the potential for environmental accidents associated with the project, and what measures will be taken to prevent and respond to such incidents?
- Can you provide examples of similar projects where efficient building designs have successfully reduced energy demands, and what lessons from those projects will be applied to ensure the sustainability of this development?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, MARUTA Raterman 5544 Inner Circle Dr Riverside ca 92506

Name, and address Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 9:18 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 5.3.5

Environmental Impacts - Threshold B: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

- The addition of 600-800 vehicles each day in the area would have a damaging effect on air quality. Leaving in the morning and returning in the evening with increased traffic on already crowded roads. The solution is to modify the traffic signals?
- Can you provide detailed traffic impact studies that specifically address how the addition of 600-800 vehicles daily will affect air quality in the area, particularly during peak morning and evening hours?
- What specific mitigation measures, beyond modifying traffic signals, do you propose to reduce the cumulative air quality impacts from the increased vehicle traffic generated by the project?
- Have you conducted any air quality modeling to assess the potential increase in criteria pollutants, especially those for which the region is already in nonattainment? If so, can you share the results and methodology?
- How does your project plan to encourage alternative transportation methods to reduce reliance on personal vehicles and mitigate air quality impacts?
- Can you provide a comprehensive analysis of how the project's cumulative air quality impacts, when combined with other planned developments in the area, align with regional air quality improvement goals and plans?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, MARUTA Raterman 5544 Inner Circle Dr Riverside Ca 92506 Name, and address Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 9:16 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR: Section 5.1.5

Threshold C: In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

- This will be a huge build protruding into the commercial space creating an unsightly view and disrupting the continuity of the area. It will be an eyesore and no evidence has been provided that reflects anything different.
- Can you provide visual simulations or renderings of the proposed project from various publicly accessible vantage points to demonstrate how it will impact the existing visual character and quality of the site and its surroundings?
- How does the proposed project comply with applicable zoning and other regulations governing scenic quality in the area, and what specific design elements have been incorporated to minimize visual disruption?
- What measures will be taken to ensure that the project does not create an unsightly view or disrupt the continuity of the commercial space, and how will these measures be enforced?
- Have you conducted any community consultations or surveys to gather feedback on the visual impact of the proposed project, and if so, what were the findings and how have they been addressed in the project design?
- Can you provide examples of similar projects where large builds have been successfully integrated into commercial spaces without degrading the visual character or quality, and what lessons from those projects will be applied to this development?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, MARUTA Raterman 5544 Inner Circle Dr Riverside Ca 92506 Name, and address Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 9:35 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 6.2

Significant and Unavoidable Adverse Impacts - VMT: VMT mitigation measures and strategies aim to promote overall mobility with the goal of reducing VMT and GHG emissions. Implementation of the project design features and TDM measures outlined in Section 5.17 Transportation, may possibly reduce the proposed Project's VMT by approximately up to 17.7 percent. These TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent but will not reduce the impact to a less than significant level. Therefore, the proposed Project would have significant and unavoidable impacts related to transportation.

- Significant and unavoidable impacts related to transportation. Lets create a project that will serve the community and provide enhancements.
- Given that the proposed TDM measures can only reduce VMT by up to 17.7 percent and will not bring the impact to a less than significant level, what additional or alternative strategies have you considered to further mitigate VMT and GHG emissions?
- Can you provide a detailed explanation of the specific TDM measures outlined in Section 5.17 Transportation, and how each measure contributes to the overall reduction in VMT?
- What are the potential long-term impacts on the community if the significant and unavoidable transportation impacts are not fully mitigated, and how do you plan to address these impacts?
- Have you explored any partnerships with local transit agencies, businesses, or community organizations to develop more comprehensive solutions for reducing VMT and enhancing overall mobility?
- Can you provide examples of similar projects where significant and unavoidable transportation impacts were successfully managed or mitigated, and what lessons from those projects will be applied to ensure the success of this development?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, MARUTA Raterman 5544 Inner Circle Dr Riverside Ca 92506 Name, and address Mission Grove Neighborhood Alliance

From: Michael McCarthy < Mike M@radical research.llc>

**Sent:** Monday, June 24, 2024 9:18 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Mission Grove Apartments SCH #2022100610 public comment

Attachments: MissionGrove\_EIR.pdf

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica,

Attached please find comments on the Mission Grove Apartments Project. Please confirm receipt of this comment letter when you get an opportunity.

Thanks!

Mike McCarthy

Ward 4 92508 June 24, 2024

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: vhernandez@riversideca.gov

RE: Public comment on record for the Mission Grove Apartments SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart and developing high-density residential housing in a 9.92 acre parcel.

The proposed Project is inconsistent with multiple City of Riverside land use policies, including General Plan, the Mission Grove Specific Plan, the current zoning, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

The Project Objectives list several policies around housing, which are consistent with the goals of the Housing Element of the City of Riverside and required Regional Housing Needs Assessment policies.

- High-quality residential development adjacent to amenities and transit corridors
- Increase housing availability
- Maximize residential potential of the site to meet housing demand
- Create a mixed-use environment encouraging walkability
- Identify mixed-use development standards in the Specific Plan amendment to create a coherent framework for integration of uses

Other objectives include efficient land-use with infill development, climate action plan with green building practices, and design elements that are 'compatible and complementary' with existing adjacent residential.

Overall, a residential infill development is a good use of this land. I appreciate that this is the plan and the goal is to address this issue. However, I am disappointed in the straw-man way the tensions between maximizing housing potential and ensuring consistency with local land-use zoning and density policies is resolved in this draft EIR.

The goal should be to maximize consistency with the neighborhood and its existing policies, not to *a priori* designate housing RHNA consistency the maximum benefit. Progress towards RHNA is an incremental goal made across dozens of projects – this project needs to reduce its inconsistency with the General Plan, Mission Grove Specific Plan, ALUC, and Title 19 Development Standards.

The Project can be made significantly more consistent with existing General Plan, Mission Grove Specific Plan, ALUC, and March ARB consistent by (1) lowering the residential density from 30 dwelling units/acre to something closer to the designated and allowable 12 units/acre and (2)

replacing first-floor residential with first-floor retail/commercial on frontage buildings to make this an actual mixed-use development consistent with Title 19 standards, instead of merely high-density residential.

# General Plan Housing Element

The City of Riverside Housing Element component of its General Plan was updated in 2021 and covers the sixth RHNA cycle from 2021-2029.<sup>1</sup>

- Policy HE-1 Affordable Housing The project provides no affordable housing.
   Inconsistent.
- **Policy HE-2** Homelessness The project only indirectly impacts homelessness via increasing housing stock. Likely inconsistent.
- **Policy HE-3** Fair Housing it promotes housing, so probably consistent.
- **Policy HE-4** Thriving Neighborhoods this project does create a new type of housing in the neighborhood by ignoring the General Plan, zoning, specific plan, and ALUC consistency criteria inconsistent.
- **Policy HE-5** Regulations this does reduce regulations by overriding inconsistencies with General Plan, Specific Plan, Zoning, and ALUC consistency criteria. Consistent.
- Policy HE-6, HE-7 not applicable
- Policy HE-8 Access to food this is close to shopping consistent

Secondly, Figure AFFH-26 in the Housing Element Technical Report, released only a few years ago, identified 'Opportunity sites' for affirmatively furthering fair housing based on vacant and underutilized sites in high resource areas. The Kmart parcel and Mission Grove neighborhood both meet those criteria, yet the site was not identified as an opportunity site inventory in Figure AFFH-26, which would have prompted the City of Riverside to change the zoning and specific plan for the parcel in 2021, like it did for the *mixed-use village* overlay sites along Van Buren in Orangecrest. It is not clear why the site was not identified and why it is being proposed for the *mixed-use urban* designation less than 3 years later.

While there is a need for more housing, maximizing housing for RHNA consistency while ignoring and omitting other General Plan consistency issues is not the path forward. Since this project provides no affordable housing and is inconsistent with most other recently adopted Housing Element policies, it does not seem like a clearly obvious overriding consideration to meeting Housing Element needs.

Bottom-line, the project would add significant housing at 12-15 du/acre with ground-level retail and would reduce the significant and unavoidable impacts of the inconsistencies with the Mission Grove Specific Plan and General Plan land-use elements by doing so.

<sup>&</sup>lt;sup>1</sup> https://www.riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/2023/2022-09%20Final%20Certified%20HE%20Housing%20Element.pdf

# Mission Grove Specific Plan<sup>2</sup>

The Mission Grove Specific Plan identifies the layout and density of the planned community of Mission Grove. 'The Mission Grove Specific Plan is a master-planned development to provide industrial and residential land-uses in a park like atmosphere.'

The residential portion is specifically intended to yield a total of '2,413 dwelling units'.

**Policy LU-69.1** – Do not permit further amendments to the Mission Grove Specific Plan that would *increase the residential density* of the neighborhood or otherwise conflict with the March Air Reserve Base/Inland Port

Table 4 specifically identifies density of land-uses in dwelling units per acre. Medium-density residential is 4 units per acre, medium-high density residential and high-density residential are restricted to 12 units per acre. Retail business and office are designated for ~70 acres.

Current zoning for Mission Grove residential blocks are:

- R-1-8500 north of Port Royal Way
- R-3-3000 between Port Royal Way and Alessandro
- R-3-2000 between Northrop Dr and Alessandro (Mission Grove Park apartments)
- SRR along Avenida Hacienda
- R-1-7000 between Kilmarnock, Northrop, and JFK
- R-3-4000 between Mission Village, Mission Grove, and Northrop
- R-1-7000 and R-3-4000 between Trautwein, White Dove Lane and Mission Village
- R-3-2000 for the Estancia Apartments
- R-1-8500 west of Trautwein

R-1 densities are all less than 6.2 dwelling units per acre. R-3 densities are 10.9 du/acre for 4000, 14.5 du/acre for R-3-3000, and 21.8 du/acre for R-3-2000. This project is inconsistent with all existing density and zoning for the area and is in the highest density category allowable - MU-U or R-4. The big difference is that a MU-U allows lower setback requirements, higher building sizes,

The Project will override the Mission Grove Specific Plan to (1) change the maximum density from 12 units/acre to 30 units/acre, (2) increase the dwelling units by 15% over the planned number of units, (3) reduce the retail business/office footprint by 10 acres to increase the residential footprint by a corresponding amount, and (4) increase the housing/jobs ratio locally, thus causing more VMT since there are few high paying jobs locally to support the costs of housing in the area.

The current population of Mission Grove is 7,642<sup>3</sup>. The estimated 829 tenants of the Project would increase the population by ~11%. That is a **significant change** for a single project for the Mission Grove Neighborhood, which is the appropriate level of determination for the project based on the scale of the cumulative impact analysis performed by the applicant. The City of Riverside will have a miniscule impact, but this project has already been determined to be inconsistent with all

<sup>&</sup>lt;sup>2</sup> https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/spec-plans/mission-grove-sp.pdf

<sup>3</sup> https://www.point2homes.com/US/Neighborhood/CA/Riverside/Mission-Grove-Demographics.html

previous planning documents (housing element, general plan, mission grove specific plan, ALUC) and is therefore a significant and unavoidable impact to the Mission Grove neighborhood.

Reduced density and ground-floor retail would reduce the significant and unavoidable impacts of the inconsistencies with all of the existing planning documents.

# Airport Land Use Compatibility

The project was deemed inconsistent by the ALUC commission. The project is in the C2 Flight corridor zone for March Air Reserve Base. Recommended density in the C2 flight zone is 6 du/acre, with variances for infill development allowed for up to 12 du/acre. The project went before the ALUCP and was deemed inconsistent.

For some reason, the project assesses non-residential average intensity and non-residential single-acre intensity – these are inapplicable. This project, as described, is purely residential. Therefore, the non-residential uses don't apply. If the project zoning of mixed-use urban was altered to include non-residential uses such as ground floor retail/commercial/office, it would apply and the project would be partially consistent.

Reduced residential density would help to bring this project into greater consistency with ALUC. Alternatively, the City of Riverside should remove all those policies about protecting March Air Reserve Base from its General Plan (LU-22.3, LU22.5, LU22.7, LU22.9).

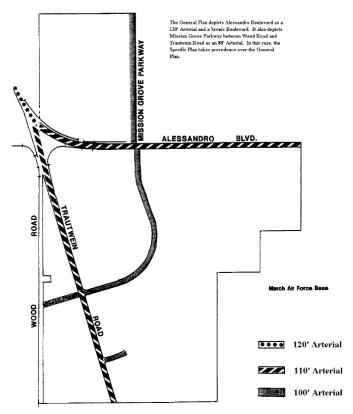
#### Mixed-use Urban requires ground floor retail along arterial streets

The MU-U zoning requires 80% of the lineal frontage of the ground floor fronting on any arterial street be leasable retail, office, or other commercial<sup>4</sup>. Currently, this project has no ground floor retail proposed. Mission Grove Parkway is an arterial, as shown in the Mission Grove Specific Plan in Figure 4 and Figure CCM-4 in the General Plan Circulation element. Building D and C are arterial facing on Mission Grove Parkway South and should have 80% ground floor retail/commercial/office required.

Currently, there is no ground-floor retail described in the project. It is not clear why this inconsistent mixed-use urban zoning is not identified as inconsistent with Title 19 Development Standards in the DEIR. Please describe how this is consistent with MU-U zoning criteria with no ground floor retail/office/commercial along arterial frontage buildings.

<sup>&</sup>lt;sup>4</sup>https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/forms/2022/COMMERCIAL%20Z ONES%20HANDOUT%20-%20A10.pdf – footnote 8

Figure 4 — Circulation Plan



# **Cumulative Impacts List**

The project omits the Van Buren apartments released via NOP last month, the second car wash under construction on Alessandro at Vista Grande Drive, and multiple warehouse projects under construction on Old 215 and Alessandro, Alessandro and Commercial Center, Meridian Parkway, and Van Buren and Barton. It also omits substantial SFR residential construction projects in south Orangecrest that will contribute to traffic on Trautwein and Alessandro, such as Wood and Lurin SCH 2022070337 and Lurin-Cole SCH 2021060437. It also excludes the enhanced noise of the Meridian Aviation Gateway project SCH 2021040012 that would increase cargo flights overhead in the C2 flight zone.

Alessandro Blvd is already the busiest road in the city and a significant bypass route for vehicles trying to avoid traffic on the 215. The cumulative transportation impacts from the additional development in this area with no bike or pedestrian infrastructure added to provide multi-modal alternatives is a significant impact to the neighborhood.

# Walkability/Bikability for Adjacent Residential to Access Shopping Center

The project claims to be a mixed-use urban project but is simply a high-density residential building with no mixed-uses. It is impermeable, gated, and taller than surrounding buildings. I walk to the stores within the Mission Grove shopping center a couple of times per week and this project will reduce the walkability of the shopping center as it has no design features that accommodate access for bikes or pedestrians from the south along Mission Grove Parkway. In fact, this project

will increase the distance I must travel since there are no alleys or access points to bypass the new structures. Given that I carry groceries from the store, that extra distance and inconvenience will sometimes be the difference between driving and walking, making the shopping center less convenient for existing residents. I again ask for there to be a permeable envelope or accessible alleyway to bypass the project and access the shopping center without having to walk around a fortified residential complex blocking the shopping center.

All walkability features of the project are *internal to the project*, thus negatively impacting the walkability/bikability of the existing communities. Please consider project design features that enhance walkability/bikability *external* to the project boundaries for existing residents.

# Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through Alternative 2 – Lower Density ALUC MFR project or a truly mixed-use project with ground floor retail. As described, I would like to see the City of Riverside aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project, rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City cannot make its residential goals on the back of any single project and it should aim to make steady progress towards its residential housing goals while maximizing its consistency with existing planning guidelines.

Thank you for your consideration of this letter.

Mike McCarthy

Ward 4 - 92508.

From: Nancy Magi <troutquilt@sbcglobal.net>

**Sent:** Sunday, June 23, 2024 7:17 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Ms. Hernandez. Over the last 4 years, I have watched numerous proposed projects be approved by City Council. I have yet to see ONE where CEQA was not WAIVED- why is that? The environment is important. And while, CEQA may need reform, its intent is protect us and the land from over development. Riverside is past the tipping point. I am unable to drive in town from Point A to Point B without congestion. This massive project will impact Alessandro and Central beyond overload.

Downsize the project. Add more amenities and green space for the residents. (I have not checked the parking situation on this project, but guarantee that there is no street parking.)

Thank you.

Nancy Magi Ward 3

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.2

State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)).

- These alternative selections are not market-driven but simply as they relate to the project's significant effects. The city advocates for the project, so they will not be looking for objective and relevant alternatives unless they meet their needs. How did you determine the range of alternatives presented in the EIR, and can you provide evidence that these alternatives genuinely address the project's significant environmental effects?
- Given that the City is described as an advocate for the project, what measures have been taken to ensure an objective evaluation of alternatives that may not align with the City's preferences?
- Can you explain the process used to assess the feasibility of each alternative, particularly those that might substantially lessen environmental impacts but may not fully align with the City's goals?
- How have you incorporated public input, especially from stakeholders who may have differing views from the City, into the selection and evaluation of project alternatives?

• What criteria were used to determine that the presented alternatives would "foster informed decision-making and public participation," and how can you demonstrate that these criteria were applied objectively?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance

Nancy Sent from my iPhone From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:34 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 5.11.6

Threshold B: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? City of Riverside General Plan 2025, Consistency with General Plan Policies

- There is no justification for abandoning the General Plan, Specific Plan, Zoning, and other regulations.
- Can you provide a detailed analysis of how the proposed project aligns with or deviates from specific policies in the City of Riverside General Plan 2025, particularly those related to land use and environmental protection?
- What compelling reasons or changed circumstances justify abandoning the existing General Plan, Specific Plan, and zoning regulations for this particular site?
- Have you conducted any studies or assessments to evaluate the potential long-term impacts of deviating from established land use plans and policies on the surrounding community and environment?
- How does the proposed project address the purpose of "avoiding or mitigating an environmental effect" as mentioned in Threshold B, given that it appears to conflict with existing land use plans?
- Can you provide examples of similar projects in Riverside or comparable cities where significant deviations from established land use plans were approved, and what were the outcomes and lessons learned from those cases?

## Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr Riverside, Ca 92506 Mission Grove Neighborhood Alliance

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:24 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 5.1.1

Aesthetics-Setting: Although the majority of the City is urbanized

- This is not true and no evidence has been provided to support this statement.
- Can you provide specific data or studies that support the claim that the majority of the City is urbanized? What metrics or criteria were used to make this determination?
- How do you define "urbanized" in the context of this project, and what percentage of the City meets this definition according to your analysis?
- Have you conducted a comprehensive land use survey of the City to verify the extent of urbanization? If so, can you share the methodology and results?
- How does the level of urbanization in the immediate project area compare to other parts of the City, and how might this impact the project's compatibility with its surroundings?
- Given that the statement about urbanization has been challenged, how does this affect your overall assessment of the project's aesthetic impacts, particularly in terms of its compatibility with the existing visual character of the area?

# Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr Riverside Ca 92506 Mission Grove Neighborhood Alliance From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:23 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 4.3

Developments Considered in Cumulative Impact Analysis Total of six (6) developments • One residential development with 54 residential dwelling units • Three commercial developments • Two distribution warehouses • Meridian Specific Plan – West Campus Upper Plateau Project with warehouses for high-cube fulfillment and cold storage, business park office, warehouse, and mixed-use buildings, retail, and park (active and public).

- No other high density projects in the area except the new project at Van Buren and Wood Str
- Can you provide a detailed analysis of how the proposed high-density residential project will interact with the existing and planned developments in the area, particularly the commercial and warehouse projects mentioned in the cumulative impact analysis?
- What specific measures will be taken to mitigate any potential cumulative impacts on traffic, infrastructure, and public services resulting from the combination of your project and the other developments in the area?
- How does the proposed high-density residential project align with the overall land use and development strategy for the area, given that there are no other high-density projects except the one at Van Buren and Wood Street?
- Have you conducted any studies to assess the potential economic and social impacts of introducing a high-density residential project in an area predominantly characterized by commercial and warehouse developments?
- Can you provide examples of similar areas where high-density residential projects have been successfully integrated with commercial and warehouse developments, and what lessons from those projects will be applied to ensure the success of this proposed development?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

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Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr

# Riverside CA 92506 Mission Grove Neighborhood Alliance

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:22 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.4

- Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. Increase the type and amount of housing available consistent with the goals of the City's Housing Element.
- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
- This is not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likely hood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood.
- Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for high-density urban apartments in a suburban neighborhood like Mission Grove?
- How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services?
- What measures will be taken to ensure that the proposed mixed-use development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation?
- Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development?
- How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels?

## Summary

The project is currently inconsistent with several City policies and development standards.

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning

development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr Riverside Ca 92506 Mission Grove Neighborhood Alliance

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:21 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 6.2

Significant and Unavoidable Adverse Impacts - VMT: VMT mitigation measures and strategies aim to promote overall mobility with the goal of reducing VMT and GHG emissions. Implementation of the project design features and TDM measures outlined in Section 5.17 Transportation, may possibly reduce the proposed Project's VMT by approximately up to 17.7 percent. These TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent but will not reduce the impact to a less than significant level. Therefore, the proposed Project would have significant and unavoidable impacts related to transportation.

- Significant and unavoidable impacts related to transportation. Lets create a project that will serve the community and provide enhancements.
- Given that the proposed TDM measures can only reduce VMT by up to 17.7 percent and will not bring the impact to a less than significant level, what additional or alternative strategies have you considered to further mitigate VMT and GHG emissions?
- Can you provide a detailed explanation of the specific TDM measures outlined in Section 5.17 Transportation, and how each measure contributes to the overall reduction in VMT?
- What are the potential long-term impacts on the community if the significant and unavoidable transportation impacts are not fully mitigated, and how do you plan to address these impacts?
- Have you explored any partnerships with local transit agencies, businesses, or community organizations to develop more comprehensive solutions for reducing VMT and enhancing overall mobility?
- Can you provide examples of similar projects where significant and unavoidable transportation impacts were successfully managed or mitigated, and what lessons from those projects will be applied to ensure the success of this development?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr Riverside ca 92506 Mission Grove Neighborhood Alliance

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:20 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.17.5

Parking - Unbundle Residential Parking Costs from Property Cost. According to CAPCOA, increasing the cost of owning a vehicle will decrease or discourage vehicle ownership and therefore reduce VMT and GHG. CAPCOA transportation Measure T-16, Unbundle Residential Parking Costs from Property Cost, was used to estimate the amount of VMT reduction that can be achieved by charging for additional parking stalls. The Project proposes to provide 1 parking stall to every apartment unit within the rental unit fee (no additional charge) and charge \$75 per month for any and each additional parking spaces, which may reduce Project VMT by up to 3.9%.

- This section appears to be in violation of AB 1317 signed into law in 2023 and effective in January 2025 with any new certificate of occupancy, requires that all parking be unbundled and charged for separately. With this project being in the middle of a shopping center, not providing enough parking for the number of units, and the tenants being able to opt out of paying for parking since the shopping center parking is free, creates numerous issues for the retail establishments and their customers. This is especially true since occupancy standards allow for up to 6 people in a one bedroom. None of this has been addressed in this report.
- How do you plan to comply with AB 1317, which requires all parking to be unbundled and charged for separately starting in January 2025, given that your current proposal includes one parking stall per apartment unit within the rental fee?
- What specific measures will be implemented to prevent tenants from opting out of paying for parking and instead using the free parking available in the shopping center, potentially causing parking shortages for retail customers?
- Can you provide a detailed analysis of the potential impacts on retail establishments and their customers if tenants use the shopping center parking, including any mitigation strategies to address these issues?
- How do you plan to address the potential for high occupancy rates (up to 6 people in a one-bedroom unit) and the resulting increased demand for parking, which may exceed the provided parking capacity?
- Have you conducted any studies or assessments to evaluate the effectiveness of unbundling residential parking costs in reducing VMT and GHG emissions, and how do these findings support the proposed parking strategy for this project?

# Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its

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Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr Mission Grove Neighborhood Alliance

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:18 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.17.5

Environmental Impacts - Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? The City's guidelines provide guidance regarding VMT analysis based on land use types. 10. Implement Subsidized or Discounted Transit Program (TRT-4). In conclusion, while the previously discussed TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent, these measures would not reduce the Project-generated VMT impact to a less than significant level.

- The VMT impact cannot be mitigated.
- Given that the proposed TDM measures are insufficient to reduce the Project-generated VMT impact to a less than significant level, what additional innovative strategies or technologies have you considered to further mitigate VMT impacts?
- Can you provide a detailed analysis of how the 17.7 percent reduction in VMT was calculated, and what specific assumptions were made in this calculation?
- Have you explored partnerships with local transit agencies or ride-sharing companies to develop more robust transit solutions that could potentially reduce VMT beyond the current projections?
- What specific measures will be implemented to monitor and evaluate the effectiveness of the proposed TDM strategies over time, and how will these findings be used to adjust and improve VMT reduction efforts?
- Given that the VMT impact cannot be fully mitigated, how do you plan to address potential community concerns about increased traffic congestion and related environmental impacts, particularly in the context of the project's consistency with local and regional transportation plans?

## Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Sincerely,

Norman Cole

166 Acacia Glen Dr. Riverside, CA 92506 Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 3:12 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 5.9.6 March Air Reserve Base/United States Air Force Input -On July 31, 2023, the Air Force provided comments supporting ALUC's recommendation of inconsistency due to concerns with the project's inconsistent density. • MARB does not support this project. • Given that the proposed density of 35 du/ac significantly exceeds both the ALUC maximum of 6 du/ac for Zone C2 and the area's historical maximum of 16 du/ac, what specific justifications can you provide for proposing such a dramatic increase in density? • Have you conducted any studies or analyses to assess the potential impacts of this substantial density increase on local infrastructure, traffic patterns, and community services? • How do you plan to address potential safety concerns related to the project's non-compliance with ALUC density requirements, particularly given its proximity to March Air Reserve Base? • Can you provide examples of similar successful projects that have received approval for such significant deviations from ALUC requirements, and explain how those precedents might apply to this case? • What specific mitigation measures or design features are you proposing to offset the potential negative impacts of exceeding the ALUC density requirements by such a large margin? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr.

**Sent:** Sunday, June 23, 2024 3:11 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Norman Cole

Mission Grove Neighborhood Alliance

166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:10 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Thank you for your consideration of this letter. Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:09 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 3.3.1 The proposed Project includes a General Plan Amendment (GPA) to change the existing General Plan Land Use Designation of the project site from C - Commercial to MU-U - Mixed Use-Urban, to allow residential land use. • This is not an urban area and the proposed project is not Mixed Use. • Can you provide specific examples or case studies where similar suburban areas have successfully transitioned to Mixed Use-Urban designations, and how those transitions impacted the local community and environment? • What specific elements of the proposed project will ensure that it meets the criteria for Mixed Use-Urban zoning, particularly in terms of integrating residential and commercial uses in a way that benefits the community? • How does the proposed project plan to address potential increases in traffic and parking demands, given that the area is not currently designed to support highdensity residential use? • Can you provide detailed plans or designs that demonstrate how the proposed project will integrate residential and commercial elements to create a true mixed-use environment, rather than just a high-density residential project? • What specific benefits does the proposed General Plan Amendment and zoning change offer to the existing community, and how do these benefits outweigh the potential negative impacts identified in the EIR? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan. Specific Plan. ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Norman Cole

Mission Grove Neighborhood Alliance

166 Acacia Glen Dr. Riverside, CA 92506 From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:33 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.9.6

Due to the inconsistency of the maximum residential density, the project would result in a significant and unavoidable impact. There are no feasible mitigation measures that would reduce impacts related to inconsistency with the residential density criteria.

- There is no evidence as to why the project is being considered at all based on this issue. Other than it helps meet the Cities RHNA requirements.
- Given that the project would result in a significant and unavoidable impact due to inconsistency with maximum residential density requirements, what specific justifications can you provide for pursuing this project beyond meeting the City's RHNA requirements?
- Have you explored any alternative designs or configurations that could bring the project closer to compliance with the residential density criteria while still meeting your development goals?
- Can you provide detailed analysis of how the benefits of this project, including its contribution to RHNA requirements, outweigh the significant and unavoidable impacts identified in the EIR?
- What specific measures do you propose to mitigate or offset the negative impacts of exceeding the maximum residential density, even if they cannot fully resolve the inconsistency?
- Have you conducted any studies or community engagement efforts to assess local support or opposition to this project, given its significant deviation from established density requirements?

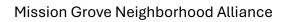
### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Norman Cole 166 Acacia Glen Dr Riverside ca 92506



**Sent:** Sunday, June 23, 2024 3:08 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 3.2.2 The site is bordered on the north, west, and east (across Mission Grove Parkway) by the Mission Grove Plaza Shopping Center, which has a General Plan Land Use Designation of C - Commercial and is zoned CR-SP - Commercial Retail and Specific Plan (Mission Grove) Overlay Zones, and is developed with retail uses. Multi-family residences are located further north (across Alessandro Boulevard), which have a General Plan Land Use Designation of HDR - High-Density Residential, and are zoned R-3-3000-SP – Multi-Family Residential and Specific Plan (Mission Grove) Overlay Zones. The project site is bordered on the south by a single-family residential neighborhood (across Mission Village Drive), which has a General Plan Land Use Designation of Medium High Density Residential (MHDR) and is zoned R-1-7000-SP - Single-Family Residential and Specific Plan (Mission Grove) Overlay Zones. • No market studies, supply and demand analysis or other data has been provided to support a High Density residential property being dropped into a retail shopping center in a suburban neighborhood with nothing nearby even close to the density levels being proposed is going to improve the area. Not to mention the impacts of traffic and parking. • Can you provide detailed market studies and supply/demand analyses that specifically justify the need for high-density residential development within this existing retail-focused area? • How do you plan to mitigate the potential impacts on traffic and parking, given that the proposed high-density residential project will be situated in a primarily retail and lower-density residential area? • What specific measures will be implemented to ensure a smooth transition between the proposed high-density development and the surrounding lower-density residential and commercial areas? • Have you conducted any community impact assessments to determine how the introduction of a high-density residential property might affect the character and functionality of the existing suburban neighborhood? • Given the significant difference in density between the proposed project and the surrounding areas, what specific benefits do you anticipate this development will bring to the existing community that outweigh potential negative impacts? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City

of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:07 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:06 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Sincerely,
Norman Cole
Mission Grove Neighborhood Alliance
166 Acacia Glen Drive
Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:06 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 3.2 The current land use of the project site is a vacant retail site. The General Plan designation for the project site is C - Commercial and it is currently zoned as CR-SP - Commercial Retail and Specific Plan (Mission Grove) Overlay Zones. The site is designated as Retail Business & Office within the Mission Grove Specific Plan. • No supporting market data that indicates the Land Use, Zoning, General Plan and Specific Plan should be abandoned. ● Can you provide detailed market data and analysis that supports the need for changing the current land use, zoning, General Plan, and Specific Plan designations from Commercial to Mixed Use-Urban? • What specific factors or trends in the local real estate market indicate that the current commercial designation is no longer viable or appropriate for the project site? • How does the proposed change in land use and zoning align with the broader goals and objectives of the Mission Grove Specific Plan and the City of Riverside's General Plan? ● Have you conducted any feasibility studies or economic impact assessments to compare the potential benefits and drawbacks of maintaining the site as a commercial retail space versus redeveloping it for mixed-use or residential purposes? • What community engagement or consultation processes have been undertaken to gather input from local residents and stakeholders regarding the proposed changes, and how have their concerns and suggestions been addressed in the project planning? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Norman Cole 166 Acacia Glen Dr. Riverside, Ca 92506 Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 3:05 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 3.0 • General Plan Amendment (GPA) – to change the General Plan Land Use Designation from C - Commercial to MU-U - Mixed Use-Urban, to allow residential land use. • Zoning Code Amendment (RZ) – to change the zoning from CR-SP Commercial Retail and Specific Plan (Mission Grove) Overlay Zones to MU-U-SP – Mixed Use-Urban and Specific Plan (Mission Grove) Overlay Zones. • Specific Plan Amendment (SPA) - to revise the Mission Grove Specific Plan. • Tentative Parcel Map (TPM) 38598 - to subdivide the existing Parcel 1 of Parcel Map 26320 into two parcels for financing and conveyance purposes. • Design Review (DR) - for the proposed site design and building elevations. • Environmental Impact Report (EIR) – for the preparation of an Environmental Impact Report for the proposed Project. • Airport Land Use Commission (ALUC) - determination of consistency or inconsistency with applicable airport land use compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). • These Actions are a drastic abandonment of the current requirements established years ago to protect the neighborhood and ensure community continuity. No data or research has been provided that shows viable reasons for discarding these effective requirements. The proposed project is for a high density apartment project, not a mixed use building. Mixed use requires 80% of the ground floor to be offered as Commercial, Retail or Office space. This project does not match the zoning change. • Can you provide detailed data or research that supports the need for changing the General Plan Land Use Designation from Commercial to Mixed Use-Urban, and how this change will benefit the community? ● How does the proposed high-density apartment project align with the requirements for mixed-use zoning, particularly the stipulation that 80% of the ground floor be dedicated to commercial, retail, or office space? • What specific measures will be taken to ensure that the proposed project does not negatively impact the neighborhood's character and continuity, which were protected by the original zoning requirements? • Have you conducted any studies or analyses to determine the potential impacts of the proposed zoning changes on local traffic, infrastructure, and public services, and if so, what were the findings? • How does the proposed project address the compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use

Compatibility Plan, and what steps will be taken to mitigate any identified inconsistencies? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:04 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 5.16.4 Project Design- Parks -The Zoning Code requires 150 square feet of common usable open space per unit for projects in the Mixed-Use – Urban Zone, for a total of 52,050 square feet of required open space. The applicant is proposing a Specific Plan Amendment to require 75 square feet of common usable open space per unit for the Mixed-Use - Urban designation, for a total of 26,025 square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres. • Another concession, modify the Park size requirement in the Specific Plan to a much lower level from 52,050 SF down to 26,025 SF so the project qualifies. Where is all that support for high density residential housing when all the requirements must be changed. These requirements are there for a reason. • Can you provide a detailed justification for reducing the common usable open space requirement from 150 square feet per unit to 75 square feet per unit, and explain how this reduction aligns with the overall goals of promoting high-density residential housing while maintaining quality of life for residents? • What specific studies or data have you used to determine that 75 square feet of common usable open space per unit is sufficient for the well-being and recreational needs of the residents in this high-density development? • How do you plan to mitigate the potential negative impacts of reducing the open space requirement by nearly 50%, particularly in terms of resident health, community interaction, and overall livability of the development? • Can you provide examples of similar high-density residential projects where reduced open space requirements have been successfully implemented without compromising the quality of life for residents? • Given that these requirements are in place for specific reasons, what additional amenities or design features do you propose to compensate for the significant reduction in common usable open space, and how will these ensure that the project still meets the intent of the original requirements? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give

primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Thank you for your consideration of this lette Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:03 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 5.14.6 Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040. • There is no evidence to support this statement. The City cannot and does not maintain the current infrastructure and provide adequate services. If the growth rate is estimated to be 3,000 per year from 2020 to 2040, then why the RHNA commitment for 20,000 housing units by 2029. • Can you provide detailed evidence and data to support the statement that the General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access, and infrastructure, particularly in light of current infrastructure and service challenges? • How do you reconcile the estimated annual growth rate of 3,000 people per year from 2020 to 2040 with the RHNA commitment for 20,000 housing units by 2029, and what specific strategies will be implemented to meet this housing target? • What measures are being taken to ensure that the existing infrastructure and services can be upgraded or expanded to support the projected population growth and the additional housing units required by the RHNA commitment? • Can you provide a comprehensive analysis of the current state of infrastructure and services in the City of Riverside, including any identified deficiencies, and how these will be addressed to support future growth? • How will the proposed project contribute to meeting the RHNA commitment, and what specific steps will be taken to ensure that the development aligns with the broader goals and requirements of the General Plan 2025 and the 6th Cycle Housing Element? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely,

Norman Cole

Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:02 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 5.14.6 Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) • Yes, the project could have as many as 6 people in a one bedroom, potentially doubling the projected occupancy of 839 to over 1600, the population implications have not considered this issue as it relates to the local community of Mission Grove with less than 8000 residents. It's the unplanned population growth to the local community that has not been examined. • Can you provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit? • How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections? • What measures will be implemented to monitor and manage the actual occupancy rates of the residential units to ensure they align with the projected numbers and do not lead to unplanned population growth? • Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents? • Can you provide examples of similar projects where unplanned population growth was effectively managed, and what strategies from those projects will be applied to mitigate potential impacts in Mission Grove? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter. Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:01 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 3.3.5 Parking- The Project includes 604 parking spaces in total. Of these, 513 parking spaces will be dedicated for the Proposed apartment project, and 91 will be shared between the Proposed apartment project and the existing adjacent retail site. The shared parking will be memorialized in a new covenant and restriction agreement between the residential developer entity and Mission Grove Plaza. 58 spaces are Tandem. • Only 513 parking spaces within the project and 58 of those are tandem spaces. 91 shared spaces with the shopping center. There is no support for this many parking spaces. The area is not conducive to people without auto transportation. The transit corridor is not reliable and not widely used. There is no support for this limited parking and the tenants can opt out of paying for parking and simply use the shopping center. This is has not been examined adequately. • Can you provide detailed data or studies that support the adequacy of 513 parking spaces for the proposed apartment project, including the 58 tandem spaces, given the area's reliance on auto transportation and the unreliability of the transit corridor? • How do you plan to enforce the covenant and restriction agreement to ensure that tenants do not opt out of paying for parking and instead use the shopping center's parking spaces, potentially causing parking shortages for retail customers? • What measures will be taken to address potential overflow parking issues, particularly during peak shopping hours, given that 91 parking spaces are shared between the residential project and the adjacent retail site? • Have you conducted any traffic and parking studies to assess the impact of the proposed parking arrangement on the surrounding area, and if so, what were the findings and recommendations? • Can you provide examples of similar mixed-use developments where a comparable parking strategy has been successfully implemented, and what lessons from those projects will be applied to ensure the success of this proposed parking plan? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential

needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely,

Norman Cole
Mission Grove Neighborhood Alliance
166 Acacia Glen Dr.
Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 3:00 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr. Riverside, CA 92506 From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:31 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 6.1

Therefore, the Project will not affect the orderly expansion of the MARB/IPA. A City Council proposed overrule of an ALUC action must provide a copy of the proposed decision and findings to both ALUC and the California Division of Aeronautics, a minimum of 45 days prior to decision to overrule ALUC. These agencies have 30 days in which to provide comments to City Council.

- Rejected by ALUC for residential density issues.
- How do you plan to address the potential violation of the City General Plan Objective LU-22, which aims to avoid land use decisions that could impact the long-term viability of the March Air Reserve Base/Inland Port Airport (MARB/IPA)?
- What specific justifications can you provide for the City Council's proposed decision to overrule the ALUC's action, particularly in light of the residential density issues that led to the rejection?
- Can you provide a detailed analysis of how the proposed project will not affect the orderly expansion of MARB/IPA, despite the ALUC's concerns about residential density?
- What measures will be taken to ensure that the proposed project complies with the procedural requirements for overruling an ALUC action, including providing the necessary documentation and allowing for agency comments?
- Have you conducted any risk assessments or consulted with aviation experts to evaluate the potential consequences of proceeding with the project despite the ALUC's rejection, and if so, what were the findings and recommendations?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr

# Riverside ca 92506 Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

**Sent:** Sunday, June 23, 2024 2:59 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR. SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies. The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 3.2 Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan. • No market data has been presented to support changing this area designation to Residential. • Can you provide comprehensive market data and analysis that justifies changing the area designation from Retail Business & Office to Residential, particularly considering the site's central location within the Specific Plan area? • How does the proposed residential development align with the original intent and goals of the Mission Grove Specific Plan, and what specific benefits will it bring to the area that the current Retail Business & Office designation does not? • Have you conducted any studies to assess the potential economic impact of removing retail and office space from this central location, and if so, what were the findings? • What measures do you propose to ensure that the loss of potential retail and office space in this area won't negatively impact local employment opportunities or the overall economic balance of the Mission Grove area? • Can you provide examples of similar successful conversions from Retail Business & Office to Residential in comparable specific plan areas, and what lessons from those projects can be applied to ensure the success of this proposed change? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixeduse project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Norman Cole

Mission Grove Neighborhood Alliance

166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 2:57 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr.

**Sent:** Sunday, June 23, 2024 2:56 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Sincerely,
Norman Cole
Mission Grove Neighborhood Alliance
166 Acacia Glen Dr.
Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 2:55 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Thank you for your consideration of this letter.

Sincerely, Norman Cole

166 Acacia Glen Dr.

RIverside, CA 92506 Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 2:54 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

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Norman Cole 166 Acacia Glen Dr. Riverside, CA 92506

**Sent:** Sunday, June 23, 2024 2:48 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dr RIverside, CA 92506Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 2:46 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Norman Cole Mission Grove Neighborhood Alliance 166 Acacia Glen Dt. Riverside CA 92506

Mission Grove Neighborhood Alliance

**Sent:** Sunday, June 23, 2024 2:44 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Norman Cole 166 Acacia Glen Dr Riverside, CA 92506 Mission Grove Neighborhood Alliance From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:30 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

# Section 6.2

ALUC: Project would result in a significant and unavoidable impact. Although implementation of the recommended conditions identified in the Riverside County Airport Land Use Commission (ALUC) Staff Report for the Project would not render the Project consistent with the MARB/IPA LUCP Compatibility Zone C2 density compatibility criteria, they would be implemented, in order to reduce the potential hazards from flight accidents to the greatest extent feasible.

- Rejected by ALUC for residential density issues.
- Given that the ALUC has rejected the project due to residential density issues and determined it would result in a significant and unavoidable impact, what specific justifications can you provide for proceeding with the project as proposed?
- Can you provide a detailed analysis of how the recommended conditions from the ALUC Staff Report would mitigate potential hazards, despite not fully resolving the density compatibility issues?
- Have you explored any alternative designs or configurations that would bring the project into compliance with the MARB/IPA LUCP Compatibility Zone C2 density criteria, and if so, why were these alternatives not pursued?
- What specific measures beyond the ALUC's recommended conditions do you propose to further reduce potential flight accident hazards and address safety concerns?
- How do you plan to address potential legal and liability issues that may arise from developing a project that has been deemed inconsistent with airport land use compatibility criteria by the responsible agency?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr Riverside ca 92506 Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:29 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 5.1.5

Threshold C: In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

- This will be a huge build protruding into the commercial space creating an unsightly view and disrupting the continuity of the area. It will be an eyesore and no evidence has been provided that reflects anything different.
- Can you provide visual simulations or renderings of the proposed project from various publicly accessible vantage points to demonstrate how it will impact the existing visual character and quality of the site and its surroundings?
- How does the proposed project comply with applicable zoning and other regulations governing scenic quality in the area, and what specific design elements have been incorporated to minimize visual disruption?
- What measures will be taken to ensure that the project does not create an unsightly view or disrupt the continuity of the commercial space, and how will these measures be enforced?
- Have you conducted any community consultations or surveys to gather feedback on the visual impact of the proposed project, and if so, what were the findings and how have they been addressed in the project design?
- Can you provide examples of similar projects where large builds have been successfully integrated into commercial spaces without degrading the visual character or quality, and what lessons from those projects will be applied to this development?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr Riverside Ca 92506 Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:28 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR: Section 6.3

Significant Irreversible Environmental Changes - This section addresses the use of non-renewable resources during initial and continued phases of the Project, the commitment of future generations to environmental changes or impacts because of the Project, and any irreversible damage from environmental accidents associated with the Project. Operation of the Project would irreversibly increase local demand for non-renewable energy resources, such as petroleum products and natural gas. Increasingly efficient building design, however, will offset this demand to some degree by reducing energy demands of the Project.

- The project will increase energy and utility demands.
- Can you provide a detailed analysis of the projected increase in local demand for non-renewable energy resources, such as petroleum products and natural gas, due to the operation of the project?
- What specific measures will be implemented to ensure that increasingly efficient building designs will effectively offset the increased energy demands of the project?
- How do you plan to mitigate the long-term environmental impacts and irreversible changes associated with the increased use of non-renewable resources?
- Have you conducted any risk assessments to evaluate the potential for environmental accidents associated with the project, and what measures will be taken to prevent and respond to such incidents?
- Can you provide examples of similar projects where efficient building designs have successfully reduced energy demands, and what lessons from those projects will be applied to ensure the sustainability of this development?

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

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Sincerely,

Norman Cole 166 Acacia Glen Dr Riverside, Ca 92506 Mission Grove Neighborhood Alliance Sent from my T-Mobile 4G LTE Device

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:27 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 6.3.2

Commitment of Future Generations - Approval of the Project would result in environmental changes or impacts that commit future generations to new environmental circumstances. Primarily, the approval of the Project would change the underlying GP 2025 land use designations and zoning of the Project site and the Mission Grove Specific Plan land use and zoning, as detailed in Section 5.11, Land Use and Planning. The change in the underlying regulations would allow for a change from C - Commercial to MU-U - Mixed Use-Urban for a multi-family development. This would result, in turn, in an increase in population as compared to commercial development as envisioned in the City's GP 2025.

- This project would have a lasting effect on the local area for generations. It would also set a precedent that all the regulations can be waived or overwritten if the local government wants a project that does not meet the current criteria and the people affected the most by the project will struggle to be heard.
- Can you provide a detailed analysis of how the proposed change from C Commercial to MU-U Mixed Use-Urban will impact the long-term land use and zoning consistency within the Mission Grove Specific Plan and the broader GP 2025 framework?
- What specific measures will be taken to ensure that the voices and concerns of the local community, who are most affected by the project, are adequately heard and addressed throughout the planning and approval process?
- How do you plan to mitigate the potential negative impacts of increased population density on local infrastructure, public services, and community resources, given the shift from commercial to multi-family residential development?
- Can you provide examples of similar projects where changes in land use designations and zoning have been successfully implemented without setting a negative precedent for future developments, and what lessons from those projects will be applied here?
- What long-term monitoring and evaluation strategies will be put in place to assess the environmental and social impacts of the project on future generations, and how will these findings be used to inform future land use and zoning decisions?

## Summary

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Thank you for your consideration of this letter.

Sincerely,

Norman Cole 166 Acacia Glen Dr Riverside ca 92506 Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:26 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR: Section 5.3.5

Environmental Impacts - Threshold B: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

- The addition of 600-800 vehicles each day in the area would have a damaging effect on air quality. Leaving in the morning and returning in the evening with increased traffic on already crowded roads. The solution is to modify the traffic signals?
- Can you provide detailed traffic impact studies that specifically address how the addition of 600-800 vehicles daily will affect air quality in the area, particularly during peak morning and evening hours?
- What specific mitigation measures, beyond modifying traffic signals, do you propose to reduce the cumulative air quality impacts from the increased vehicle traffic generated by the project?
- Have you conducted any air quality modeling to assess the potential increase in criteria pollutants, especially those for which the region is already in nonattainment? If so, can you share the results and methodology?
- How does your project plan to encourage alternative transportation methods to reduce reliance on personal vehicles and mitigate air quality impacts?
- Can you provide a comprehensive analysis of how the project's cumulative air quality impacts, when combined with other planned developments in the area, align with regional air quality improvement goals and plans?

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Norman Cole 166 Acacia Glen Dr Riverside Ca 92506 Mission Grove Neighborhood Alliance Sent from my T-Mobile 4G LTE Device

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:25 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Sent from my T-Mobile 4G LTE Device

From: nd.cole <nd.cole@sbcglobal.net>
Sent: Monday, June 24, 2024 11:35 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR:

### Section 5.11.2.4

- 1. Mix land uses.2. Take advantage of compact building design.3. Create a range of housing opportunities and choices.4. Create walkable neighborhoods.5. Foster distinctive, attractive communities with a strong sense of place.6. Preserve open space, farmland, natural beauty and critical environmental areas.7. Strengthen and direct development toward existing communities.7. Strengthen and direct development toward existing communities.9. Make development decisions predictable, fair and cost effective.10. Encourage community and stakeholder collaboration in development decisions.
- Putting a large high density residential project in the middle of a suburban neighborhood does not satisfy any of these principles.
- How does your proposed high-density residential project in a suburban neighborhood align with the principle of strengthening and directing development toward existing communities, rather than expanding into less developed areas?
- Can you provide specific examples of how your project will create a walkable neighborhood and foster a distinctive, attractive community with a strong sense of place, given its location in a primarily suburban setting?
- How does your project plan to preserve open space and critical environmental areas, considering it's introducing a high-density development into a less densely populated area?
- What measures are you taking to ensure a range of housing opportunities and choices within your project, and how does this diversity fit within the context of the existing suburban neighborhood?
- How have you incorporated community and stakeholder collaboration in your development decisions, particularly in addressing concerns about the project's compatibility with the suburban character of the area?

# Summary

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Sincerely,

Norman Cole 166 Acacia Glen Dr Riverside, Ca 92506 Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

From: pattimike48 <pattimike48@aol.com>
Sent: Sunday, June 23, 2024 1:38 PM

To: Hernandez, Veronica

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EIR, SCH # 2022100610

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### Section 5.16.4

Project Design- Parks -The Zoning Code requires 150 square feet of common usable open space per unit for projects in the Mixed-Use – Urban Zone, for a total of 52,050 square feet of required open space. The applicant is proposing a Specific Plan Amendment to require 75 square feet of common usable open space per unit for the Mixed-Use – Urban designation, for a total of 26,025 square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres.

- Another concession, modify the Park size requirement in the Specific Plan to a much lower level from 52,050 SF down to 26,025 SF so the project qualifies. Where is all that support for high density residential housing when all the requirements must be changed. These requirements are there for a reason.
- Can you provide a detailed justification for reducing the common usable open space requirement from 150 square feet per unit to 75 square feet per unit, and explain how this reduction aligns with the overall goals of promoting high-density residential housing while maintaining quality of life for residents?
- What specific studies or data have you used to determine that 75 square feet of common usable open space per unit is sufficient for the well-being and recreational needs of the residents in this high-density development?
- How do you plan to mitigate the potential negative impacts of reducing the open space requirement by nearly 50%, particularly in terms of resident health, community interaction, and overall livability of the development?
- Can you provide examples of similar high-density residential projects where reduced open space requirements have been successfully implemented without compromising the quality of life for residents?
- Given that these requirements are in place for specific reasons, what additional amenities or design features do you propose to compensate for the significant reduction in common usable open space, and how will these ensure that the project still meets the intent of the original requirements?

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Thank you for your consideration of this letter.

Sincerely,

Kim KIPP 6859 ranchgrove riverside Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: pattimike48 <pattimike48@aol.com>
Sent: Sunday, June 23, 2024 1:37 PM

To: Hernandez, Veronica

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More specifically, I would like to comment on the following sections related to the EIR:

### Section 5.14.6

Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

- Yes, the project could have as many as 6 people in a one bedroom, potentially doubling the projected occupancy of 839 to over 1600, the population implications have not considered this issue as it relates to the local community of Mission Grove with less than 8000 residents. It's the unplanned population growth to the local community that has not been examined.
- Can you provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit?
- How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections?
- What measures will be implemented to monitor and manage the actual occupancy rates of the residential units to ensure they align with the projected numbers and do not lead to unplanned population growth?
- Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents?
- Can you provide examples of similar projects where unplanned population growth was effectively managed, and what strategies from those projects will be applied to mitigate potential impacts in Mission Grove?

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To: Hernandez, Veronica

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

### Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040.

- There is no evidence to support this statement. The City cannot and does not maintain the current infrastructure and provide adequate services. If the growth rate is estimated to be 3,000 per year from 2020 to 2040, then why the RHNA commitment for 20,000 housing units by 2029.
- Can you provide detailed evidence and data to support the statement that the General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access, and infrastructure, particularly in light of current infrastructure and service challenges?
- How do you reconcile the estimated annual growth rate of 3,000 people per year from 2020 to 2040 with the RHNA commitment for 20,000 housing units by 2029, and what specific strategies will be implemented to meet this housing target?
- What measures are being taken to ensure that the existing infrastructure and services can be upgraded or expanded to support the projected population growth and the additional housing units required by the RHNA commitment?
- Can you provide a comprehensive analysis of the current state of infrastructure and services in the City of Riverside, including any identified deficiencies, and how these will be addressed to support future growth?
- How will the proposed project contribute to meeting the RHNA commitment, and what specific steps will be taken to ensure that the development aligns with the broader goals and requirements of the General Plan 2025 and the 6th Cycle Housing Element?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

# Ronald kipp 6859 ranchgrove riv Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: pattimike48 <pattimike48@aol.com>
Sent: Sunday, June 23, 2024 1:35 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

### Section 5.14.6

Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

- Yes, the project could have as many as 6 people in a one bedroom, potentially doubling the projected occupancy of 839 to over 1600, the population implications have not considered this issue as it relates to the local community of Mission Grove with less than 8000 residents. It's the unplanned population growth to the local community that has not been examined.
- Can you provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit?
- How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections?
- What measures will be implemented to monitor and manage the actual occupancy rates of the residential units to ensure they align with the projected numbers and do not lead to unplanned population growth?
- Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents?
- Can you provide examples of similar projects where unplanned population growth was effectively managed, and what strategies from those projects will be applied to mitigate potential impacts in Mission Grove?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

# Patricia kipp Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: pattimike48 <pattimike48@aol.com>
Sent: Sunday, June 23, 2024 1:40 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

### Section 3.0

- General Plan Amendment (GPA) to change the General Plan Land Use Designation from C Commercial to MU-U Mixed Use-Urban, to allow residential land use. Zoning Code Amendment (RZ) to change the zoning from CR-SP Commercial Retail and Specific Plan (Mission Grove) Overlay Zones to MU-U-SP Mixed Use-Urban and Specific Plan (Mission Grove) Overlay Zones. Specific Plan Amendment (SPA) to revise the Mission Grove Specific Plan.
- Tentative Parcel Map (TPM) 38598 to subdivide the existing Parcel 1 of Parcel Map 26320 into two parcels for financing and conveyance purposes.
- Design Review (DR) for the proposed site design and building elevations.
- Environmental Impact Report (EIR) for the preparation of an Environmental Impact Report for the proposed Project.
- Airport Land Use Commission (ALUC) determination of consistency or inconsistency with applicable airport land use compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP).
- These Actions are a drastic abandonment of the current requirements established years ago to protect the neighborhood and ensure community continuity. No data or research has been provided that shows viable reasons for discarding these effective requirements. The proposed project is for a high density apartment project, not a mixed use building. Mixed use requires 80% of the ground floor to be offered as Commerical, Retail or Office space. This project does not match the zoning change.
- Can you provide detailed data or research that supports the need for changing the General Plan Land Use Designation from Commercial to Mixed Use-Urban, and how this change will benefit the community?
- How does the proposed high-density apartment project align with the requirements for mixed-use zoning, particularly the stipulation that 80% of the ground floor be dedicated to commercial, retail, or office space?
- What specific measures will be taken to ensure that the proposed project does not negatively impact the neighborhood's character and continuity, which were protected by the original zoning requirements?
- Have you conducted any studies or analyses to determine the potential impacts of the proposed zoning changes on local traffic, infrastructure, and public services, and if so, what were the findings?
- How does the proposed project address the compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, and what steps will be taken to mitigate any identified inconsistencies?

### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency

with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Patricia kipp 6859 ranchgrove rd riverside Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: PATTI WESTBROOK < pattiback@msn.com>

**Sent:** Sunday, June 23, 2024 10:17 PM

**To:** Hernandez, Veronica

**Subject:** [EXTERNAL] KMART APARTMENT PROJECT

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

I am a Mission Grove homeowner and do not want these apartments at the center. We want more

restaurant choices and shopping.

Patti Westbrook 130 Cape Elizabeth Way....Riverside. From: Patty Huddleston < huddlestonpatty@gmail.com >

**Sent:** Monday, June 24, 2024 10:35 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likely hood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood. • Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for highdensity urban apartments in a suburban neighborhood like Mission Grove? • How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services? • What measures will be taken to ensure that the proposed mixeduse development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation? • Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development? • How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Patty Huddleston 639 Burwood Ct. Mission Grove Neighborhood Alliance

From: Patty Huddleston < huddlestonpatty@gmail.com >

**Sent:** Monday, June 24, 2024 10:29 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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preserving some of the existing structure while addressing housing needs? • Given the trend of repurposing retail spaces for alternative uses, as mentioned in the search results, what innovative approaches have you considered for this site beyond traditional retail or residential development? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Patty Huddleston 639 Burwood Ct Mission Grove Neighborhood Alliance

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**Sent:** Monday, June 24, 2024 10:28 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors? • Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics? • Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Patty Huddleston 639 Burwood Ct. Mission Grove Neighborhood Alliance

From: Patty Huddleston < huddlestonpatty@gmail.com>

**Sent:** Monday, June 24, 2024 10:40 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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community with a strong sense of place, given its location in a primarily suburban setting? How does your project plan to preserve open space and critical environmental areas, considering it's introducing a high-density development into a less densely populated area? • What measures are you taking to ensure a range of housing opportunities and choices within your project, and how does this diversity fit within the context of the existing suburban neighborhood? • How have you incorporated community and stakeholder collaboration in your development decisions, particularly in addressing concerns about the project's compatibility with the suburban character of the area? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Patty Huddleston 639 Burwood Ct Mission Grove Neighborhood Alliance

From: Raelene Lawrence <raelawrence10@gmail.com>

**Sent:** Monday, June 24, 2024 10:33 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.9.6

Due to the inconsistency of the maximum residential density, the project would result in a significant and unavoidable impact. There are no feasible mitigation measures that would reduce impacts related to inconsistency with the residential density criteria.

- There is no evidence as to why the project is being considered at all based on this issue. Other than it helps meet the Cities RHNA requirements.
- Given that the project would result in a significant and unavoidable impact due to inconsistency with maximum residential density requirements, what specific justifications can you provide for pursuing this project beyond meeting the City's RHNA requirements?
- Have you explored any alternative designs or configurations that could bring the project closer to compliance with the residential density criteria while still meeting your development goals?
- Can you provide detailed analysis of how the benefits of this project, including its contribution to RHNA requirements, outweigh the significant and unavoidable impacts identified in the EIR?
- What specific measures do you propose to mitigate or offset the negative impacts of exceeding the maximum residential density, even if they cannot fully resolve the inconsistency?
- Have you conducted any studies or community engagement efforts to assess local support or opposition to this project, given its significant deviation from established density requirements?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Raelene Lawrence 909 High View Drive Riverside CA 92506 Mission Grove Neighborhood Alliance

From: Regina Munoz <r.munoz84@yahoo.com>

**Sent:** Monday, June 24, 2024 10:32 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040.

- There is no evidence to support this statement. The City cannot and does not maintain the current infrastructure and provide adequate services. If the growth rate is estimated to be 3,000 per year from 2020 to 2040, then why the RHNA commitment for 20,000 housing units by 2029.
- Can you provide detailed evidence and data to support the statement that the General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access, and infrastructure, particularly in light of current infrastructure and service challenges?
- How do you reconcile the estimated annual growth rate of 3,000 people per year from 2020 to 2040 with the RHNA commitment for 20,000 housing units by 2029, and what specific strategies will be implemented to meet this housing target?
- What measures are being taken to ensure that the existing infrastructure and services can be upgraded or expanded to support the projected population growth and the additional housing units required by the RHNA commitment?
- Can you provide a comprehensive analysis of the current state of infrastructure and services in the City of Riverside, including any identified deficiencies, and how these will be addressed to support future growth?
- How will the proposed project contribute to meeting the RHNA commitment, and what specific steps will be taken to ensure that the development aligns with the broader goals and requirements of the General Plan 2025 and the 6th Cycle Housing Element?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Regina Munoz Creekside Homes Mission Grove Neighborhood Alliance

From: Raelene Lawrence <raelawrence10@gmail.com>

**Sent:** Monday, June 24, 2024 10:32 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.4

- Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. Increase the type and amount of housing available consistent with the goals of the City's Housing Element.
- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
- This is not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likely hood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood.
- Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for high-density urban apartments in a suburban neighborhood like Mission Grove?
- How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services?
- What measures will be taken to ensure that the proposed mixed-use development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation?
- Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development?
- How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning

development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Raelene Lawrence 909 High View Drive Riverside, CA 92506 Mission Grove Neighborhood Alliance From: Raelene Lawrence <raelawrence10@gmail.com>

**Sent:** Monday, June 24, 2024 10:35 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

#### Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Raelene Lawrence

909 High View Drive Riverside CA 92506 Mission Grove Neighborhood Alliance From: Rainee Khabagnote <raineealexisk@gmail.com>

**Sent:** Monday, June 24, 2024 7:49 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

#### Dear Ms. Hernandez:

Thank you for the hearing our comments on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments project consisting of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. In keeping with this admonition, alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

As a Riverside resident, I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for us residents. My husband and I specifically moved to Mission Grove because we wanted a suburban community. I believe adding at least more than 347 families would hugely affect traffic and community experience. In addition as a physician, I am deeply concerned about the years of construction proposed adjacent to our neighborhood. My husband and I specifically picked this neighborhood because it was away from major roads and construction for air quality and health reasons. Lastly, I don't believe the traffic caused by this project and then the minimum 347 more residents would be mitigated by adjusting traffic lights. We have already experienced major traffic from the short-term projects done on Alessandro. If this project were to be approved as is, my husband and I would strongly consider leaving this area because it in essence changes our community. More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed

residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units.

- The ALUC will allow higher density than 6 du/ac. The surrounding area shows densities as high as 16 du/ac. A 16du/ac with retail on the bottom floor would be more compatible with the area. Especially if the unit mix concentrated on 2 and 3 bedroom.
- Given that the surrounding area shows densities up to 16 dwelling units per acre, why have you chosen a significantly lower density of 58 units for Alternative 2, rather than exploring a middle ground that could better align with the neighborhood character?
- Have you conducted any studies to determine how a mixed-use development with retail on the ground floor and residential units above (at 16 du/ac) would impact local economic vitality and housing affordability compared to your current proposal?
- Can you provide a comparative analysis of the environmental impacts, particularly regarding traffic and infrastructure demands, between your proposed 347-unit development and a potential 16 du/ac mixed-use alternative?
- How would focusing on two and 3-bedroom units in a higher-density scenario affect the project's ability to meet local housing needs, especially for families, compared to your current unit mix?
- Considering that the Airport Land Use Commission (ALUC) allows for higher density than six du/ac, what factors led to the decision to propose such a low-density alternative, and how does this align with broader city planning goals for efficient land use and housing provision.
- Have you conducted a comprehensive market analysis to determine the viability of attracting a large-scale retail tenant for the entire building, and if so, what were the key findings?
- Have you explored any mixed-use alternatives that could incorporate retail and residential components, potentially preserving some of the existing structure while addressing housing needs?
- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?

 How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?

# Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs, or attracting a different large-scale tenant, or moving the project to another site. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of us current residents. Thank you for considering all options that are best for our community.

# Sincerely,

Rainee Khabagnote and Michael Choi 945 High Peak Drive, Riverside CA 92506 Mission Grove Neighborhood Alliance From: Ira and Rajean Long <longfam611@gmail.com>

**Sent:** Monday, June 24, 2024 8:20 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Ira and Rajean Long 7048 Clty View Clrcle Riverside, CA 92506 Mission Grove Neighborhood Alliance From: Ira and Rajean Long <longfam611@gmail.com>

**Sent:** Monday, June 24, 2024 8:19 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.9.6

Due to the inconsistency of the maximum residential density, the project would result in a significant and unavoidable impact. There are no feasible mitigation measures that would reduce impacts related to inconsistency with the residential density criteria.

- There is no evidence as to why the project is being considered at all based on this issue. Other than it helps meet the Cities RHNA requirements.
- Given that the project would result in a significant and unavoidable impact due to inconsistency with maximum residential density requirements, what specific justifications can you provide for pursuing this project beyond meeting the City's RHNA requirements?
- Have you explored any alternative designs or configurations that could bring the project closer to compliance with the residential density criteria while still meeting your development goals?
- Can you provide detailed analysis of how the benefits of this project, including its contribution to RHNA requirements, outweigh the significant and unavoidable impacts identified in the EIR?
- What specific measures do you propose to mitigate or offset the negative impacts of exceeding the maximum residential density, even if they cannot fully resolve the inconsistency?
- Have you conducted any studies or community engagement efforts to assess local support or opposition to this project, given its significant deviation from established density requirements?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Ira and Rajean Long 7048 City View CIrcle Riverside, CA 92506 Mission Grove Neighborhood Alliance

From: Ira and Rajean Long <longfam611@gmail.com>

**Sent:** Monday, June 24, 2024 8:18 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Parking - Unbundle Residential Parking Costs from Property Cost. According to CAPCOA, increasing the cost of owning a vehicle will decrease or discourage vehicle ownership and therefore reduce VMT and GHG. CAPCOA transportation Measure T-16, Unbundle Residential Parking Costs from Property Cost, was used to estimate the amount of VMT reduction that can be achieved by charging for additional parking stalls. The Project proposes to provide 1 parking stall to every apartment unit within the rental unit fee (no additional charge) and charge \$75 per month for any and each additional parking spaces, which may reduce Project VMT by up to 3.9%.

- This section appears to be in violation of AB 1317 signed into law in 2023 and effective in January 2025 with any new certificate of occupancy, requires that all parking be unbundled and charged for separately. With this project being in the middle of a shopping center, not providing enough parking for the number of units, and the tenants being able to opt out of paying for parking since the shopping center parking is free, creates numerous issues for the retail establishments and their customers. This is especially true since occupancy standards allow for up to 6 people in a one bedroom. None of this has been addressed in this report.
- How do you plan to comply with AB 1317, which requires all parking to be unbundled and charged for separately starting in January 2025, given that your current proposal includes one parking stall per apartment unit within the rental fee?
- What specific measures will be implemented to prevent tenants from opting out of paying for parking and instead using the free parking available in the shopping center, potentially causing parking shortages for retail customers?
- Can you provide a detailed analysis of the potential impacts on retail establishments and their customers if tenants use the shopping center parking, including any mitigation strategies to address these issues?
- How do you plan to address the potential for high occupancy rates (up to 6 people in a one-bedroom unit) and the resulting increased demand for parking, which may exceed the provided parking capacity?
- Have you conducted any studies or assessments to evaluate the effectiveness of unbundling residential parking costs in reducing VMT and GHG emissions, and how do these findings support the proposed parking strategy for this project?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Ira and Rajean Long 7048 City View CIrcle Riverside, CA 92506 Mission Grove Neighborhood Alliance From: Ira and Rajean Long <longfam611@gmail.com>

**Sent:** Monday, June 24, 2024 8:18 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

## **Section 5.17.5**

Environmental Impacts - Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? The City's guidelines provide guidance regarding VMT analysis based on land use types. 10. Implement Subsidized or Discounted Transit Program (TRT-4). In conclusion, while the previously discussed TDM measures may help offset some of the VMT impacts of the proposed Project by up to 17.7 percent, these measures would not reduce the Project-generated VMT impact to a less than significant level.

- The VMT impact cannot be mitigated.
- Given that the proposed TDM measures are insufficient to reduce the Projectgenerated VMT impact to a less than significant level, what additional innovative strategies or technologies have you considered to further mitigate VMT impacts?
- Can you provide a detailed analysis of how the 17.7 percent reduction in VMT was calculated, and what specific assumptions were made in this calculation?
- Have you explored partnerships with local transit agencies or ride-sharing companies to develop more robust transit solutions that could potentially reduce VMT beyond the current projections?
- What specific measures will be implemented to monitor and evaluate the effectiveness of the proposed TDM strategies over time, and how will these findings be used to adjust and improve VMT reduction efforts?
- Given that the VMT impact cannot be fully mitigated, how do you plan to address potential community concerns about increased traffic congestion and related environmental impacts, particularly in the context of the project's consistency with local and regional transportation plans?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Ira and Rajean Long 7048 CityView Circle Riverside. CA 92506 Mission Grove Neighborhood Alliance

From: Ira and Rajean Long <longfam611@gmail.com>

**Sent:** Monday, June 24, 2024 8:20 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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More specifically, I would like to comment on the following sections related to the EIR: Section 6.3.2

Commitment of Future Generations - Approval of the Project would result in environmental changes or impacts that commit future generations to new environmental circumstances. Primarily, the approval of the Project would change the underlying GP 2025 land use designations and zoning of the Project site and the Mission Grove Specific Plan land use and zoning, as detailed in Section 5.11, Land Use and Planning. The change in the underlying regulations would allow for a change from C - Commercial to MU-U - Mixed Use-Urban for a multi-family development. This would result, in turn, in an increase in population as compared to commercial development as envisioned in the City's GP 2025.

- This project would have a lasting effect on the local area for generations. It would also set a precedent that all the regulations can be waived or overwritten if the local government wants a project that does not meet the current criteria and the people affected the most by the project will struggle to be heard.
- Can you provide a detailed analysis of how the proposed change from C Commercial to MU-U Mixed Use-Urban will impact the long-term land use and zoning consistency within the Mission Grove Specific Plan and the broader GP 2025 framework?
- What specific measures will be taken to ensure that the voices and concerns of the local community, who are most affected by the project, are adequately heard and addressed throughout the planning and approval process?
- How do you plan to mitigate the potential negative impacts of increased population density on local infrastructure, public services, and community resources, given the shift from commercial to multi-family residential development?
- Can you provide examples of similar projects where changes in land use designations and zoning have been successfully implemented without setting a negative precedent for future developments, and what lessons from those projects will be applied here?
- What long-term monitoring and evaluation strategies will be put in place to assess the environmental and social impacts of the project on future generations, and how will these findings be used to inform future land use and zoning decisions?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Rajean and Ira Long 7048 Clty View Clrcle Riverside, CA 92506 Mission Grove Neighborhood Alliance From: Randy Simmons <randy.simmons7@gmail.com>

**Sent:** Sunday, June 23, 2024 7:40 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.4

- Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. Increase the type and amount of housing available consistent with the goals of the City's Housing Element.
- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
- This is not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likely hood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood.
- Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for high-density urban apartments in a suburban neighborhood like Mission Grove?
- How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services?
- What measures will be taken to ensure that the proposed mixed-use development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation?
- Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development?
- How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning

development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Randy Simmons 6936 Cypress Grove Drive Riverside, CA 92506

Mission Grove Neighborhood Alliance

From: Randy Simmons <randy.simmons7@gmail.com>

**Sent:** Sunday, June 23, 2024 7:43 AM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

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More specifically, I would like to comment on the following sections related to the EIR:

#### Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units.

- The ALUC will allow higher density than 6 du/ac. The surrounding area shows densities as high as 16 du/ac. A 16du/ac with retail on the bottom floor would be more compatible with the area. Especially if the unit mix concentrated on 2 and 3 bedroom.
- Given that the surrounding area shows densities up to 16 dwelling units per acre, why have you chosen a significantly lower density of 58 units for Alternative 2, rather than exploring a middle ground that could better align with the neighborhood character?
- Have you conducted any studies to determine how a mixed-use development with retail on the ground floor and residential units above (at 16 du/ac) would impact local economic vitality and housing affordability compared to your current proposal?
- Can you provide a comparative analysis of the environmental impacts, particularly regarding traffic and infrastructure demands, between your proposed 347-unit development and a potential 16 du/ac mixed-use alternative?
- How would focusing on two and 3-bedroom units in a higher-density scenario affect the project's ability to meet local housing needs, especially for families, compared to your current unit mix?
- Considering that the Airport Land Use Commission (ALUC) allows for higher density than six du/ac, what factors led to the decision to propose such a low-density alternative, and how does this align with broader city planning goals for efficient land use and housing provision?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Randy Simmons 6936 Cypress Grove Drive Riverside, CA 92506 Mission Grove Neighborhood Alliance

From: olobrib <olobrib@gmail.com>
Sent: Sunday, June 23, 2024 3:37 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 3.2.3

The site is bordered on the north, west, and east (across Mission Grove Parkway) by the Mission Grove Plaza Shopping Center, which has a General Plan Land Use Designation of C - Commercial and is zoned CR-SP - Commercial Retail and Specific Plan (Mission Grove) Overlay Zones, and is developed with retail uses. Multi-family residences are located further north (across Alessandro Boulevard), which have a General Plan Land Use Designation of HDR – High-Density Residential, and are zoned R-3-3000-SP – Multi-Family Residential and Specific Plan (Mission Grove) Overlay Zones. The project site is bordered on the south by a single-family residential neighborhood (across Mission Village Drive), which has a General Plan Land Use Designation of Medium High Density Residential (MHDR) and is zoned R-1-7000-SP – Single-Family Residential and Specific Plan (Mission Grove) Overlay Zones.

- No market studies, supply and demand analysis or other data has been provided to support a High Density residential property being dropped into a retail shopping center in a suburban neighborhood with nothing nearby even close to the density levels being proposed is going to improve the area. Not to mention the impacts of traffic and parking.
- Can you provide detailed market studies and supply/demand analyses that specifically justify the need for high-density residential development within this existing retail-focused area?
- How does the proposed high-density residential project align with the current suburban character of the neighborhood, and what measures will be taken to ensure a smooth transition between the different density levels?
- Have you conducted a comprehensive traffic impact study that accounts for the increased population density and its effects on the existing retail-oriented traffic patterns in the area?
- What specific plans do you have to address potential parking issues, given that the project will be situated within a retail shopping center that likely has its own parking demands?
- How do you plan to integrate the high-density residential development with the existing retail environment to create a cohesive mixed-use area, rather than simply "dropping" a residential complex into a retail space?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Rebecca Olobri 18050 Roberts Road Riverside, CA 92508 Mission Grove Neighborhood Alliance

Sent from my Galaxy

From: olobrib <olobrib@gmail.com>
Sent: Sunday, June 23, 2024 3:36 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.9.6

March Air Reserve Base/United States Air Force Input -On July 31, 2023, the Air Force provided comments supporting ALUC's recommendation of inconsistency due to concerns with the project's inconsistent density.

- MARB does not support this project.
- Given that the proposed density of 35 du/ac significantly exceeds both the ALUC maximum of 6 du/ac for Zone C2 and the area's historical maximum of 16 du/ac, what specific justifications can you provide for proposing such a dramatic increase in density?
- Have you conducted any studies or analyses to assess the potential impacts of this substantial density increase on local infrastructure, traffic patterns, and community services?
- How do you plan to address potential safety concerns related to the project's non-compliance with ALUC density requirements, particularly given its proximity to March Air Reserve Base?
- Can you provide examples of similar successful projects that have received approval for such significant deviations from ALUC requirements, and explain how those precedents might apply to this case?
- What specific mitigation measures or design features are you proposing to offset the potential negative impacts of exceeding the ALUC density requirements by such a large margin?

# Summary

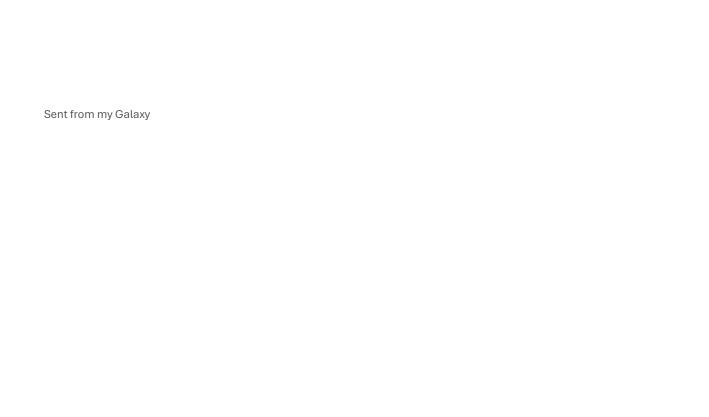
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Thank you for your consideration of this letter.

Sincerely, Rebecca Olobri 18050 Roberts Road Riverside, CA 92508

Mission Grove Neighborhood Alliance



From: olobrib <olobrib@gmail.com>
Sent: Sunday, June 23, 2024 3:35 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040.

- There is no evidence to support this statement. The City cannot and does not maintain the current infrastructure and provide adequate services. If the growth rate is estimated to be 3,000 per year from 2020 to 2040, then why the RHNA commitment for 20,000 housing units by 2029.
- Can you provide detailed evidence and data to support the statement that the General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access, and infrastructure, particularly in light of current infrastructure and service challenges?
- How do you reconcile the estimated annual growth rate of 3,000 people per year from 2020 to 2040 with the RHNA commitment for 20,000 housing units by 2029, and what specific strategies will be implemented to meet this housing target?
- What measures are being taken to ensure that the existing infrastructure and services can be upgraded or expanded to support the projected population growth and the additional housing units required by the RHNA commitment?
- Can you provide a comprehensive analysis of the current state of infrastructure and services in the City of Riverside, including any identified deficiencies, and how these will be addressed to support future growth?
- How will the proposed project contribute to meeting the RHNA commitment, and what specific steps will be taken to ensure that the development aligns with the broader goals and requirements of the General Plan 2025 and the 6th Cycle Housing Element?

#### Summary

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Thank you for your consideration of this letter.

Sincerely,

Rebecca Olobri 18050 Roberts Road Riverside, CA 92508 Mission Grove Neighborhood Alliance

Sent from my Galaxy

From: olobrib <olobrib@gmail.com>
Sent: Sunday, June 23, 2024 3:38 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.2

Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

- No market data has been presented to support changing this area designation to Residential.
- Can you provide comprehensive market data and analysis that justifies changing the area designation from Retail Business & Office to Residential, particularly considering the site's central location within the Specific Plan area?
- How does the proposed residential development align with the original intent and goals of the Mission Grove Specific Plan, and what specific benefits will it bring to the area that the current Retail Business & Office designation does not?
- Have you conducted any studies to assess the potential economic impact of removing retail and office space from this central location, and if so, what were the findings?
- What measures do you propose to ensure that the loss of potential retail and office space in this area won't negatively impact local employment opportunities or the overall economic balance of the Mission Grove area?
- Can you provide examples of similar successful conversions from Retail Business & Office to Residential in comparable specific plan areas, and what lessons from those projects can be applied to ensure the success of this proposed change?

## Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

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Sincerely,

Rebecca Olobri 18050 Roberts Road Riverside, CA 92508 Mission Grove Neighborhood Alliance Sent from my Galaxy

From: Regina Munoz <r.munoz84@yahoo.com>

**Sent:** Monday, June 24, 2024 10:31 AM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Section 5.14.6

Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

- Yes, the project could have as many as 6 people in a one bedroom, potentially doubling the projected occupancy of 839 to over 1600, the population implications have not considered this issue as it relates to the local community of Mission Grove with less than 8000 residents. It's the unplanned population growth to the local community that has not been examined.
- Can you provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit?
- How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections?
- What measures will be implemented to monitor and manage the actual occupancy rates of the residential units to ensure they align with the projected numbers and do not lead to unplanned population growth?
- Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents?
- Can you provide examples of similar projects where unplanned population growth was effectively managed, and what strategies from those projects will be applied to mitigate potential impacts in Mission Grove?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Regina Munoz Creekside Homes Mission Grove Neighborhood Alliance

From: Robert Green <rmgreen777@gmail.com>

**Sent:** Monday, June 24, 2024 2:56 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Alternative Uses - Section 7.0.3

The No Project alternative would not fulfill any of the Project's objectives as the existing site would not provide high-quality housing in close proximity to many amenities and high-quality transit corridors, assist the City of Riverside in meeting housing needs, use land resources more efficiently with infill redevelopment on an underutilized vacant site; or further the City's Climate Action Plan by replacing aging building construction with green building practices and other sustainable development methods. Under this alternative, no improvements would be made to the Project site, and the site would continue to be vacant with temporary/seasonal retail tenants.

- This assumes the property will remain as-is and is only used for temporary retail with no desire for a permanent tenant.
- Have you conducted any market studies or feasibility analyses to determine the potential for attracting permanent retail tenants to the existing site rather than assuming it will only be used for temporary/seasonal retail?
- What specific green building practices and sustainable development methods are you proposing that would significantly contribute to the City's Climate Action Plan goals?
- Can you provide a comparative analysis of how your proposed high-quality housing development would more effectively meet the city's housing needs than other potential uses for the site?
- How does your project's proximity to high-quality transit corridors specifically translate into reduced environmental impacts compared to the No Project alternative?
- Given that the site is described as "underutilized," have you explored any alternative development scenarios that could achieve similar objectives while preserving some existing structures or uses?

#### Summary

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My family and I (and our neighborhood, behind Sprouts) will be heavily affected by construction, pollution, noise, traffic congestion, parking (there will not be enough in the complex - people will park on the streets) and a rise in crime. Some solutions: a day park w/ walking areas OR a much smaller, professional residence structure with nicer restaurants for the area.

Thank you for your consideration of this letter.

Sincerely,

Robert Green
4160 Sydney Harbour Dr.
Riverside, CA 92508
Mission Grove Neighborhood Alliance

From: Robert Green <rmgreen777@gmail.com>

**Sent:** Monday, June 24, 2024 3:02 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 1.3

The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

- This is an unsupported statement that makes unsupported assumptions. This is a proposed apartment building that will replace a large portion of a commercial facility that was designed to support the neighborhood. There is no market data to support this project.
- Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change?
- How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential?
- Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed for car-dependent retail?
- What specific shared elements, including parking, are planned between the residential and retail components, and how will these be implemented without negatively impacting the existing retail operations?
- Given that the project will replace a portion of a commercial facility designed to support the neighborhood, how do you plan to mitigate the potential loss of retail services and ensure that the new development still meets the community's needs?

#### Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Ms. Hernandez, as the planner for this city, I would hope you could find something better for our community to go into the old K-Mart location. What is being planned there is overkill for the infrastructure and for our neighborhood. A greenbelt

# park or lower density residential unit (50-75) with restaurants and shops would be better.

Thank you for your consideration of this letter.

Sincerely,

Robert Green 4160 Sydney Harbour Dr. Riverside, CA 92508 Mission Grove Neighborhood Alliance From: Roylene Scott <roylenescott@gmail.com>

**Sent:** Monday, June 24, 2024 12:23 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 3.4

- Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. Increase the type and amount of housing available consistent with the goals of the City's Housing Element.
- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.
- This is not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likely hood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood.
- Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for high-density urban apartments in a suburban neighborhood like Mission Grove?
- How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services?
- What measures will be taken to ensure that the proposed mixed-use development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation?
- Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development?
- How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels?

## Summary

The project is currently inconsistent with several City policies and development standards.

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development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Roylene Scott 7741 Coastbridge Dr. Riverside -92508

Mission Grove Neighborhood Alliance

From: RUTA RATERMAN <muffinpuf@aol.com>

**Sent:** Sunday, June 23, 2024 8:54 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR:

Section 5.16.4

Project Design- Parks -The Zoning Code requires 150 square feet of common usable open space per unit for projects in the Mixed-Use – Urban Zone, for a total of 52,050 square feet of required open space. The applicant is proposing a Specific Plan Amendment to require 75 square feet of common usable open space per unit for the Mixed-Use – Urban designation, for a total of 26,025 square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres.

- Another concession, modify the Park size requirement in the Specific Plan to a much lower level from 52,050 SF down to 26,025 SF so the project qualifies. Where is all that support for high density residential housing when all the requirements must be changed. These requirements are there for a reason.
- Can you provide a detailed justification for reducing the common usable open space requirement from 150 square feet per unit to 75 square feet per unit, and explain how this reduction aligns with the overall goals of promoting high-density residential housing while maintaining quality of life for residents?
- What specific studies or data have you used to determine that 75 square feet of common usable open space per unit is sufficient for the well-being and recreational needs of the residents in this high-density development?
- How do you plan to mitigate the potential negative impacts of reducing the open space requirement by nearly 50%, particularly in terms of resident health, community interaction, and overall livability of the development?
- Can you provide examples of similar high-density residential projects where reduced open space requirements have been successfully implemented without compromising the quality of life for residents?
- Given that these requirements are in place for specific reasons, what additional amenities or design features do you propose to compensate for the significant reduction in common usable open space, and how will these ensure that the project still meets the intent of the original requirements?

# Summary

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Thank you for your consideration of this letter.

Sincerely,

Ruta Raterman 19179 Vintage Woods Drive Riverside, CA 92508

Mission Grove Neighborhood Alliance

Sent from my iPhone

From: RUTA RATERMAN <muffinpuf@aol.com>

**Sent:** Sunday, June 23, 2024 8:53 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR:

Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040.

- There is no evidence to support this statement. The City cannot and does not maintain the current infrastructure and provide adequate services. If the growth rate is estimated to be 3,000 per year from 2020 to 2040, then why the RHNA commitment for 20,000 housing units by 2029.
- Can you provide detailed evidence and data to support the statement that the General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access, and infrastructure, particularly in light of current infrastructure and service challenges?
- How do you reconcile the estimated annual growth rate of 3,000 people per year from 2020 to 2040 with the RHNA commitment for 20,000 housing units by 2029, and what specific strategies will be implemented to meet this housing target?
- What measures are being taken to ensure that the existing infrastructure and services can be upgraded or expanded to support the projected population growth and the additional housing units required by the RHNA commitment?
- Can you provide a comprehensive analysis of the current state of infrastructure and services in the City of Riverside, including any identified deficiencies, and how these will be addressed to support future growth?
- How will the proposed project contribute to meeting the RHNA commitment, and what specific steps will be taken to ensure that the development aligns with the broader goals and requirements of the General Plan 2025 and the 6th Cycle Housing Element?

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Sincerely,

Ruta Raterman 19179 Vintage Woods Drive Riverside, CA 92508

Mission Grove Neighborhood Alliance

Sent from my iPhone

From: RUTA RATERMAN <muffinpuf@aol.com>

**Sent:** Sunday, June 23, 2024 8:52 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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- Can you provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit?
- How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections?
- What measures will be implemented to monitor and manage the actual occupancy rates of the residential units to ensure they align with the projected numbers and do not lead to unplanned population growth?
- Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents?
- Can you provide examples of similar projects where unplanned population growth was effectively managed, and what strategies from those projects will be applied to mitigate potential impacts in Mission Grove?

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Thank you for your consideration of this letter.

Sincerely, Ruta Raterman 19179 Vintage Woods Drive Riverside, CA 92508 Mission Grove Neighborhood Alliance Sent from my iPhone From: RUTA RATERMAN <muffinpuf@aol.com>

**Sent:** Sunday, June 23, 2024 9:45 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

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More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0

The following discussion considers alternatives to implementing the Project and examines the potential environmental impacts resulting from each alternative. By comparing these alternatives to the Project, the relative advantage(s) can be weighed and analyzed.

- These alternatives are not based on any feasibility study, local market analysis, or other independent studies to support the statements or conclusions. Studies have shown that only a tiny percentage of old KMARTS are demolished and replaced with residential housing.
- Can you provide specific feasibility studies or local market analyses supporting the viability of converting this KMART site into residential housing?
- What percentage of similar KMART conversions to residential housing have been successful in comparable markets, and how does this inform your project's potential success?
- Have you conducted any environmental impact assessments to compare the effects of demolition and new construction versus adaptive reuse of the existing KMART structure?
- Given that studies show only a tiny percentage of old KMARTs are demolished for residential use, what unique factors make this site suitable for such a conversion?
- How does your proposed residential development align with the local community's long-term urban planning goals and housing needs, and can you provide data to support this alignment?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance

•

Sent from my iPhone

From: Steven Balmer < sjgbalmer@gmail.com>

**Sent:** Monday, June 24, 2024 1:12 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email:

VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter. Please save our area here in Riverside!

Sincerely,

Steve Balmer, 20699 Hillsdale Road, Riverside CA 92508 Mission Grove Neighborhood Alliance From: Steven Johnson < stevenejohnson54@gmail.com>

**Sent:** Monday, June 24, 2024 4:14 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 3.4 • Provide a high-quality residential development in close proximity to many existing amenities and transit corridors. • Increase the type and amount of housing available consistent with the goals of the City's Housing Element. • Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections. • Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site. • Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses. • In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods. • Create a mixed-use environment encouraging walkability. • Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping. • This is

not an urban location. Eliminating much needed commercial space for future growth is not effective and causes future problems. Once commercial property is replaced with residential, there is no going back and the likely hood of creating additional commercial locations later in an area with few vacant parcels is unlikely. There is no evidence provided as to the future housing demand and if that demand relates to high density urban apartments in a suburban neighborhood. • Can you provide updated and specific data on future housing demand in the City of Riverside, particularly focusing on the need for highdensity urban apartments in a suburban neighborhood like Mission Grove? • How do you justify the elimination of much-needed commercial space in favor of residential development, and what long-term impacts do you foresee on the local economy and community services? • What measures will be taken to ensure that the proposed mixeduse development will truly enhance walkability and integrate seamlessly with the existing suburban environment, given the current reliance on auto transportation? • Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what lessons from those projects will be applied to ensure the success of this development? • How do you plan to address concerns about the potential loss of commercial property and the difficulty of creating additional commercial locations in the future, especially in an area with few vacant parcels? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance

From: Steven Johnson < stevenejohnson54@gmail.com>

**Sent:** Monday, June 24, 2024 4:16 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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strategy for the area, given that there are no other high-density projects except the one at Van Buren and Wood Street? • Have you conducted any studies to assess the potential economic and social impacts of introducing a high-density residential project in an area predominantly characterized by commercial and warehouse developments? • Can you provide examples of similar areas where high-density residential projects have been successfully integrated with commercial and warehouse developments, and what lessons from those projects will be applied to ensure the success of this proposed development? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance Steve Johnson 6997 Randwick Road, Riverside

From: Tammy Evans <tlevans73@yahoo.com>
Sent: Monday, June 24, 2024 12:00 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 1.3

The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

- This is an unsupported statement that makes unsupported assumptions. This is a proposed apartment building that will replace a large portion of a commercial facility that was designed to support the neighborhood. There is no market data to support this project.
- Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change?
- How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential?
- Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed for car-dependent retail?
- What specific shared elements, including parking, are planned between the residential and retail components, and how will these be implemented without negatively impacting the existing retail operations?
- Given that the project will replace a portion of a commercial facility designed to support the neighborhood, how do you plan to mitigate the potential loss of retail services and ensure that the new development still meets the community's needs?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Tammy Evans 9465 Newbridge Dr Riverside, 92508

Mission Grove Neighborhood Alliance

Sent from my iPhone

From: TINA BUSHEE <tinabpostal@msn.com>
Sent: Monday, June 24, 2024 4:44 PM

**To:** Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

### Section 3.0

- General Plan Amendment (GPA) to change the General Plan Land Use Designation from C Commercial to MU-U Mixed Use-Urban, to allow residential land use. Zoning Code Amendment (RZ) to change the zoning from CR-SP Commercial Retail and Specific Plan (Mission Grove) Overlay Zones to MU-U-SP Mixed Use-Urban and Specific Plan (Mission Grove) Overlay Zones. Specific Plan Amendment (SPA) to revise the Mission Grove Specific Plan.
- Tentative Parcel Map (TPM) 38598 to subdivide the existing Parcel 1 of Parcel Map 26320 into two parcels for financing and conveyance purposes.
- Design Review (DR) for the proposed site design and building elevations.
- Environmental Impact Report (EIR) for the preparation of an Environmental Impact Report for the proposed Project.
- Airport Land Use Commission (ALUC) determination of consistency or inconsistency with applicable airport land use compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP).
- These Actions are a drastic abandonment of the current requirements established years ago to protect the neighborhood and ensure community continuity. No data or research has been provided that shows viable reasons for discarding these effective requirements. The proposed project is for a high density apartment project, not a mixed use building. Mixed use requires 80% of the ground floor to be offered as Commerical, Retail or Office space. This project does not match the zoning change.
- Can you provide detailed data or research that supports the need for changing the General Plan Land Use Designation from Commercial to Mixed Use-Urban, and how this change will benefit the community?
- How does the proposed high-density apartment project align with the requirements for mixed-use zoning, particularly the stipulation that 80% of the ground floor be dedicated to commercial, retail, or office space?
- What specific measures will be taken to ensure that the proposed project does not negatively impact the neighborhood's character and continuity, which were protected by the original zoning requirements?
- Have you conducted any studies or analyses to determine the potential impacts of the proposed zoning changes on local traffic, infrastructure, and public services, and if so, what were the findings?
- How does the proposed project address the compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, and what steps will be taken to mitigate any identified inconsistencies?

#### Summary

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Thank you for your consideration of this letter.

Sincerely, Tina Bushee 256 Alderwood Way Riverside CA 92506 Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: TINA BUSHEE <tinabpostal@msn.com>

**Sent:** Monday, June 24, 2024 4:44 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

- This is an unsupported statement that makes unsupported assumptions. This is a proposed apartment building that will replace a large portion of a commercial facility that was designed to support the neighborhood. There is no market data to support this project.
- Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change?
- How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential?
- Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed for car-dependent retail?
- What specific shared elements, including parking, are planned between the residential and retail components, and how will these be implemented without negatively impacting the existing retail operations?
- Given that the project will replace a portion of a commercial facility designed to support the neighborhood, how do you plan to mitigate the potential loss of retail services and ensure that the new development still meets the community's needs?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

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Sincerely,
Tina Bushee
256 Alderwood Way
Riverside CA 92506
Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: TINA BUSHEE <tinabpostal@msn.com>
Sent: Monday, June 24, 2024 4:43 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Alternative Uses - Section 7.0.3

The No Project alternative would not fulfill any of the Project's objectives as the existing site would not provide high-quality housing in close proximity to many amenities and high-quality transit corridors, assist the City of Riverside in meeting housing needs, use land resources more efficiently with infill redevelopment on an underutilized vacant site; or further the City's Climate Action Plan by replacing aging building construction with green building practices and other sustainable development methods. Under this alternative, no improvements would be made to the Project site, and the site would continue to be vacant with temporary/seasonal retail tenants.

- This assumes the property will remain as-is and is only used for temporary retail with no desire for a permanent tenant.
- Have you conducted any market studies or feasibility analyses to determine the potential for attracting permanent retail tenants to the existing site rather than assuming it will only be used for temporary/seasonal retail?
- What specific green building practices and sustainable development methods are you proposing that would significantly contribute to the City's Climate Action Plan goals?
- Can you provide a comparative analysis of how your proposed high-quality housing development would more effectively meet the city's housing needs than other potential uses for the site?
- How does your project's proximity to high-quality transit corridors specifically translate into reduced environmental impacts compared to the No Project alternative?
- Given that the site is described as "underutilized," have you explored any alternative development scenarios that could achieve similar objectives while preserving some existing structures or uses?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

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Sincerely, Tina Bushee 256 Alderwood Way RIVERSIDE CA 92506 Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: TINA BUSHEE <tinabpostal@msn.com>

**Sent:** Monday, June 24, 2024 4:42 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider infeasible alternatives. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)).

- These alternative selections are not market-driven but simply as they relate to the project's significant effects. The city advocates for the project, so they will not be looking for objective and relevant alternatives unless they meet their needs. How did you determine the range of alternatives presented in the EIR, and can you provide evidence that these alternatives genuinely address the project's significant environmental effects?
- Given that the City is described as an advocate for the project, what measures have been taken to ensure an objective evaluation of alternatives that may not align with the City's preferences?
- Can you explain the process used to assess the feasibility of each alternative, particularly those that might substantially lessen environmental impacts but may not fully align with the City's goals?
- How have you incorporated public input, especially from stakeholders who may have differing views from the City, into the selection and evaluation of project alternatives?
- What criteria were used to determine that the presented alternatives would "foster informed decision-making and public participation," and how can you demonstrate that these criteria were applied objectively?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Tina Bushee 256 Alderwood Way Riverside CA 92506 Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: TINA BUSHEE <tinabpostal@msn.com>
Sent: Monday, June 24, 2024 4:41 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0

The following discussion considers alternatives to implementing the Project and examines the potential environmental impacts resulting from each alternative. By comparing these alternatives to the Project, the relative advantage(s) can be weighed and analyzed.

- These alternatives are not based on any feasibility study, local market analysis, or other independent studies to support the statements or conclusions. Studies have shown that only a tiny percentage of old KMARTS are demolished and replaced with residential housing.
- Can you provide specific feasibility studies or local market analyses supporting the viability of converting this KMART site into residential housing?
- What percentage of similar KMART conversions to residential housing have been successful in comparable markets, and how does this inform your project's potential success?
- Have you conducted any environmental impact assessments to compare the effects of demolition and new construction versus adaptive reuse of the existing KMART structure?
- Given that studies show only a tiny percentage of old KMARTs are demolished for residential use, what unique factors make this site suitable for such a conversion?
- How does your proposed residential development align with the local community's long-term urban planning goals and housing needs, and can you provide data to support this alignment?

•

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,
Tina Bushee
256 Alderwood Way
Riverside CA 92506
Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: TINA BUSHEE <tinabpostal@msn.com>
Sent: Monday, June 24, 2024 4:45 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.14.6

Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

- Yes, the project could have as many as 6 people in a one bedroom, potentially doubling the projected occupancy of 839 to over 1600, the population implications have not considered this issue as it relates to the local community of Mission Grove with less than 8000 residents. It's the unplanned population growth to the local community that has not been examined.
- Can you provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit?
- How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections?
- What measures will be implemented to monitor and manage the actual occupancy rates of the residential units to ensure they align with the projected numbers and do not lead to unplanned population growth?
- Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents?
- Can you provide examples of similar projects where unplanned population growth was effectively managed, and what strategies from those projects will be applied to mitigate potential impacts in Mission Grove?

# Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Tina Bushee 256 Alderwood Way Riverside CA 92506 Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: tiniec <tiniec@juno.com>
Sent: Sunday, June 23, 2024 8:54 PM

To: Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on

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## Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Tinie Callegan Clark 17820 Roberts Rd Riverside, CA 92508 Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

From: Tony Haro <tonyharo006@gmail.com>
Sent: Monday, June 24, 2024 1:33 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

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I have serious concerns about the viability of this project, its influence on the community, and the

effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

This discussion analyzes the proposed 347 residential apartment project at an off-site location. This alternative does not include a specific off-site location; however, it is assumed for the purposes of this analysis that it would consist of redevelopment of a site similar in size and of a vacant or underutilized building or buildings within the City of Riverside. This development focuses on infill of abandoned or underutilized space. Alternative sites were not considered for this project, and thus, no specific off-site locations were considered by the applicant to be evaluated under this alternative.

- Moving the Project to a similar location but mitigating some of the issues.
- What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?
- Have you conducted any preliminary assessments of potential off-site locations that could accommodate a similar project while potentially reducing environmental impacts or addressing community concerns?
- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
- Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside?

## Summary

The project is currently inconsistent with several City policies and development standards. It could

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Name, and address Mission Grove Neighborhood Alliance Sent from my iPhone

From: Tony Haro <tonyharo006@gmail.com>
Sent: Monday, June 24, 2024 1:35 PM

To: Hernandez, Veronica

Subject: [EXTERNAL] Public comment on the record for the Mission Grove Apartments

EIR, SCH # 2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

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- Moving the Project to a similar location but mitigating some of the issues.
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- How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors?
- Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics?
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## Summary

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be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone.

The City should make steady progress toward its residential housing goals while maximizing its

consistency with existing planning guidelines and protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely, Antonio Haro 269 Cannon Rd. Riverside, Ca 92506 Mission Grove Neighborhood Alliance Sent from my iPhone

From: <u>Jeanne ONeill</u>

To: Conder, Chuck; Cervantes, Clarissa; Edwards, Erin; Plascencia, Gaby; Perry, Jim; Fierro, Ronaldo; Hemenway,

**Steve** 

Cc: Gause, Donesia; Lilley, Jennifer; Futrell, Mike; Mustafa, Nathan; 2Mayor; Hernandez, Veronica

**Subject:** [EXTERNAL] Regarding Proposed Anton Development Project in Mission Grove

Date: Wednesday, December 6, 2023 6:36:34 PM

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

# Dear Council Member,

As a proud member of the Mission Grove Neighborhood Association, I am writing to express our collective concerns regarding the proposed Anton Development project, which aims to construct a 347-apartment complex at the former Kmart location on Alessandro in Mission Grove.

Since the inception of the Mission Grove Association in April of this year, our community has grown to include 367 members who share a vested interest in the well-being and development of our neighborhood. While we appreciate the potential benefits that new projects can bring, we have identified several preliminary concerns that we believe warrant careful consideration and further review:

The market for Highest-Density Residential: We are concerned about the market demand for the highest-density, high-rise (4-story) residential development in our area and its impact on the character of Mission Grove, primarily a long-standing residential housing community.

Apartments vs. Condominiums: The choice between apartments and condominiums raises questions about the long-term stability and investment in our neighborhood. We would like to understand the rationale behind this decision.

Demand for Parking: With 347 units, there is a legitimate concern regarding the demand for parking spaces. We seek clarification on the proposed parking solutions to ensure they adequately meet the needs of both residents and the surrounding community, including EV charging stations to meet current new construction requirements.

Increased Traffic/Noise/Pollution: The introduction of such a large residential project is likely to contribute to increased traffic in the area. We request a thorough analysis of the potential traffic impact and proposed mitigation measures.

Elimination of Commercial Property: The potential elimination of commercial property raises concerns about the availability of local services and amenities. We would appreciate more information on how the project aims to serve the neighborhood's commercial needs.

Airport Commission Issues: Given the high density of the proposed project and its proximity to flight paths, we are concerned about potential issues with the Airport Commission. We want assurance that all relevant regulations and safety measures will be adhered to.

We do not expect immediate answers for these and other concerns. However, we will be

looking for these issues to be addressed as the proposed project receives further review.

We eagerly await the release of the Environmental Impact Report (EIR) for the project and any other relevant documentation. We understand an EIR Scoping meeting was held a year ago and was intended to solicit feedback from the community and discuss the scope of the EIR. No one attended this meeting and there are no records of the meeting. You now have an avenue to communicate to the Community for such announcements and meetings with the creation of the Mission Grove Neighborhood Association.

Additionally, we look forward to engaging further with the developer, City staff, and City Council to ensure that this property is developed in a manner that best serves and enhances the Mission Grove Community.

Please provide notifications for any pertinent documents, meetings, or other matters of importance related to this project.

Thank you for your attention to these concerns, and we appreciate your dedication to the well-being of our neighborhood.

Sincerely, Jeanne O'Neill

# Sonya Hooker

From: Jeanne ONeill <joyincandy@gmail.com>
Sent: Wednesday, June 26, 2024 5:37 PM

**To:** Hernandez, Veronica

**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH #

2022100610

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov

RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

Dear Ms. Hernandez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel.

The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area.

More specifically, I would like to comment on the following sections related to the EIR: Section 5.3.5

Environmental Impacts - Threshold B: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

- The addition of 600-800 vehicles each day in the area would have a damaging effect on air quality. Leaving in the morning and returning in the evening with increased traffic on already crowded roads. The solution is to modify the traffic signals?
- Can you provide detailed traffic impact studies that specifically address how the addition of 600-800 vehicles daily will affect air quality in the area, particularly during peak morning and evening hours?
- What specific mitigation measures, beyond modifying traffic signals, do you propose to reduce the cumulative air quality impacts from the increased vehicle traffic generated by the project?
- Have you conducted any air quality modeling to assess the potential increase in criteria pollutants, especially those for which the region is already in nonattainment? If so, can you share the results and methodology?
- How does your project plan to encourage alternative transportation methods to reduce reliance on personal vehicles and mitigate air quality impacts?
- Can you provide a comprehensive analysis of how the project's cumulative air quality impacts, when combined with other planned developments in the area, align with regional air quality improvement goals and plans?

# Summary

The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward protecting the well-being of current residents.

Thank you for your consideration of this letter.

Sincerely,

Pam O'Neill 8167 Faircrest Road Riverside, CA 92508