



# Mission Grove Apartments Project

Final Environmental Impact Report  
SCH# 2022100610

*prepared for*  
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**November 2024**



Mission Grove Apartments Project FEIR

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## 1.0 Introduction

The Final Environmental Impact Report (FEIR), as required pursuant to State *CEQA Guidelines* Sections 15089 and 15132, includes the Draft Environmental Impact Report (DEIR) or a revision thereof, comments and recommendations received on the DEIR, a list of persons, organizations, and public agencies commenting on the DEIR, and the responses of the lead agency, which is the City of Riverside (City) for this Project, to significant environmental points raised in the review and consultation process. A Mitigation Monitoring and Reporting Program (MMRP) is also included to ensure compliance during Project implementation (Public Resources Code Section 21081.6, State *CEQA Guidelines* Section 15097).

### 1.1. Purpose of the EIR Process

This Final Environmental Impact Report (Final EIR) is an informational document to evaluate the potential environmental impacts of the proposed Mission Grove Apartments Project (Project). The primary objectives of the EIR process under the California Environmental Quality Act (CEQA) are to inform decision-makers and the public about a project's potentially significant environmental effects, identify feasible ways to minimize significant effects, and consider a reasonable range of alternatives to the project.

This Final EIR contains 1) The Draft EIR (incorporated by reference in accordance with State CEQA Guidelines Section 15150); 2) Errata, a revision of the DEIR, including minor changes that clarify or correct minor inaccuracies; 3) Comments received on the DEIR; 4) List of persons, public agencies, organizations that commented on the DEIR; and 5) Responses to significant environmental points raised in the review period. Pursuant to the requirements of CEQA, the City of Riverside must certify the EIR as complete and adequate prior to any potential approval of the project or a project alternative.

Revisions to the Draft EIR necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR, are included in the responses to comments as well as the Errata. Underlined text represents language that has been added to the Draft EIR; text with ~~strikeout~~ has been deleted from the Draft EIR. All revisions are then compiled in the order in which they would appear in the Draft EIR (by section and page number) in Section 3, Revisions to the Draft EIR, of this document. Page numbers cited in this section correspond to the page numbers of the Draft EIR. When mitigation measure language has been changed, it has been changed in the text on the stated Draft EIR page, the summary table (Draft EIR Table 1) in the Executive Summary of the Draft EIR, and the Mitigation Monitoring and Reporting Plan (MMRP). The Final EIR includes the responses to comments on the Draft EIR provided herein and the text of the Draft EIR, revised based on responses to comments and other information.

### 1.2. EIR Certification Process and Consideration of Project Approval

In accordance with the requirements of CEQA and the procedures of the City of Riverside, the EIR must be certified as complete and adequate prior to any potential final action on the proposed

project. Once the EIR is certified and all information considered, using its independent judgment, the City can choose to take no action, or to take action to go forward with the proposed project, make changes, or select an alternative to the proposed project. While the information in the EIR does not constrain the City's ultimate decision under its land use authority, the City must respond to each significant effect and mitigation measure identified in the EIR as required by CEQA by making findings supporting its decision.

### **1.3. Public Review Summary**

The City circulated the DEIR for the Project for a 45-day public review period from May 10, 2024 through June 24, 2024. Notices of Completion and Availability of the DEIR were circulated to the State Clearinghouse, responsible agencies, trustee agencies, and other interested parties on May 10, 2024.

General public Notice of Availability of the DEIR was also given by publication in The Press-Enterprise daily circulation newspaper on May 10, 2024. As required by Public Resources Code Section 21092.3, a copy of the public notice was posted with the Riverside County Clerk on May 8, 2024.

As prescribed by the State CEQA Guidelines Sections 21091 (d), the City of Riverside, as the lead agency, is required to 1) evaluate comments on significant environmental issues received during the 45-day public comment period, and may respond to late comments, from persons who have reviewed the Draft EIR; and 2) prepare written responses to comments. (CEQA Guidelines, § 15088). The Responses to Comments, along with the comment letters, are included in Section 2 of this FEIR. In accordance with the provisions of Public Resources Code Section 21092.5, the City has provided a written response to each commenting public agency no less than 10 days prior to the proposed certification date.



## 2.0 Response to Comments

This Response to Comments (RTC) section provides responses to public and agency written comments received by the City of Riverside on the Draft Environmental Impact Report (DEIR) for the proposed Mission Grove Apartments Project (Project). The DEIR identifies the likely environmental consequences associated with development of the proposed Project and recommends mitigation measures to reduce potentially significant impacts. In addition to providing responses to public and agency comments received on the DEIR, this RTC document also makes revisions to the DEIR to clarify or amplify the existing analysis, as necessary, in response to those comments or to make clarifications to information presented in the DEIR.

### 2.1 Environmental Review Process

According to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the DEIR.

On October 28<sup>th</sup> 2022, the City of Riverside circulated a Notice of Preparation (NOP) for a 30-day period to identify environmental issue areas potentially affected if the proposed project were to be implemented. As discussed in Section 2.3 of the DEIR, the NOP was distributed to the State Clearinghouse, responsible agencies, and individuals/parties considered likely to be interested in the proposed Project and its potential impacts. Comments received by the City of Riverside on the NOP and during the November 2<sup>nd</sup>, 2022 virtual EIR scoping meeting are summarized in Table 2.0-1 of the DEIR. These comments were taken into account during the preparation of the DEIR.

The DEIR was made available for public review on May 10<sup>th</sup> 2024, and was distributed to local and State responsible and trustee agencies. Copies of the Notice of Availability of the DEIR were mailed to a list of interested parties, groups and public agencies, as well as property owners and occupants of nearby properties. The DEIR and an announcement of its availability were posted electronically on the City's website. The Notice of Availability of the DEIR was also posted at the office of the Riverside County Clerk and with the State Clearinghouse. Copies of the DEIR were made available for public viewing at the following City facilities: (1) Riverside City Hall, Community & Economic Development Department, Planning Division, 3900 Main Street, Third Floor, Riverside, CA 92522; (2) the Riverside Main Public Library, 3911 University Avenue, Riverside, CA 92508; and (3) Riverside Public Library, Orange Terrace Library, 20010-B Orange Terrace Parkway, Riverside, CA 92508.

The 45-day CEQA public comment period began on May 10<sup>th</sup>, 2024 and ended on June 24<sup>th</sup>, 2024. The City of Riverside received over 200 comment letters on the DEIR prior to the close of the public comment period. Copies of all written comments on the DEIR received are included in Section 2.3 of this document, as are responses to those comments.

### 2.2 Topical Comments and Responses

The City received 202 comment letters from individuals associated with the Mission Grove Neighborhood Alliance organization. The comments in these letters generally followed templates available on the organization's website. As the repeated comments covered the same or similar

topics in the DEIR, topical responses are provided in Table 2.2-1. The template comment letters received are contained in Appendix K to this EIR.

**Table 2.2-1 – Topical Response to Comments**

<b>1. Community Outreach</b>	
<p>What community outreach has been conducted to gauge public opinion on the proposed General Plan Amendment, and what feedback has been received?</p>	<p>Response:</p> <p>In accordance with CEQA Guideline Section 15082 – Notice of Preparation and Determination of Scope of EIR, the City prepared the Notice of Preparation of a Draft Environmental Impact Report (EIR) and EIR Scoping Meeting for the Mission Grove Apartments Project. This Notice of Preparation for the proposed Project, dated October 28<sup>th</sup>, 2022, was made available for public access on the City’s Planning webpage, under the Development Projects and CEQA Documents – Projects in Process section. The Notice of Preparation provided the period for public comment (October 28<sup>th</sup>, 2022, through November 28<sup>th</sup>, 2022) and provided information on how to attend a virtual scoping meeting for the proposed Project, which was held on November 2<sup>nd</sup>, 2022. During the scoping meeting a brief presentation on the proposed Project and an opportunity to review the proposed Project was provided. Additionally, during the Notice of Preparation public review period of October 28<sup>th</sup>, 2022, through November 28<sup>th</sup>, 2022, public agencies and interested organizations and individuals had the opportunity to identify those environmental issues with the potential to be affected by the proposed Project and that they requested to be addressed in the DEIR. The City received only one comment letter in response to the Notice of Preparation and no comments during the virtual scoping meeting. Appendix A of this EIR contains the Notice of Preparation and the comment letter received during the 30-day review period, and a summary is included in DEIR Section 2.0 Introduction (p. 1.0-6).</p> <p>On June 24, 2024 the City mailed out a Notice of Availability to property owners within 300 feet of the Project site and to various Federal, State, regional, and local government agencies, and other interested parties, including the agencies/interest groups that commented on the Notice of Preparation. The Notice of Availability was also published in the Press Enterprise newspaper.</p> <p>A Notice of Public Hearing was mailed to property owners within 300 feet of the project site after the 45-day comment</p>
<p>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?</p>	
<p>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?</p>	
<p>How will the community and local stakeholders be informed and involved in the subdivision process, and what opportunities will they have to provide input?</p>	

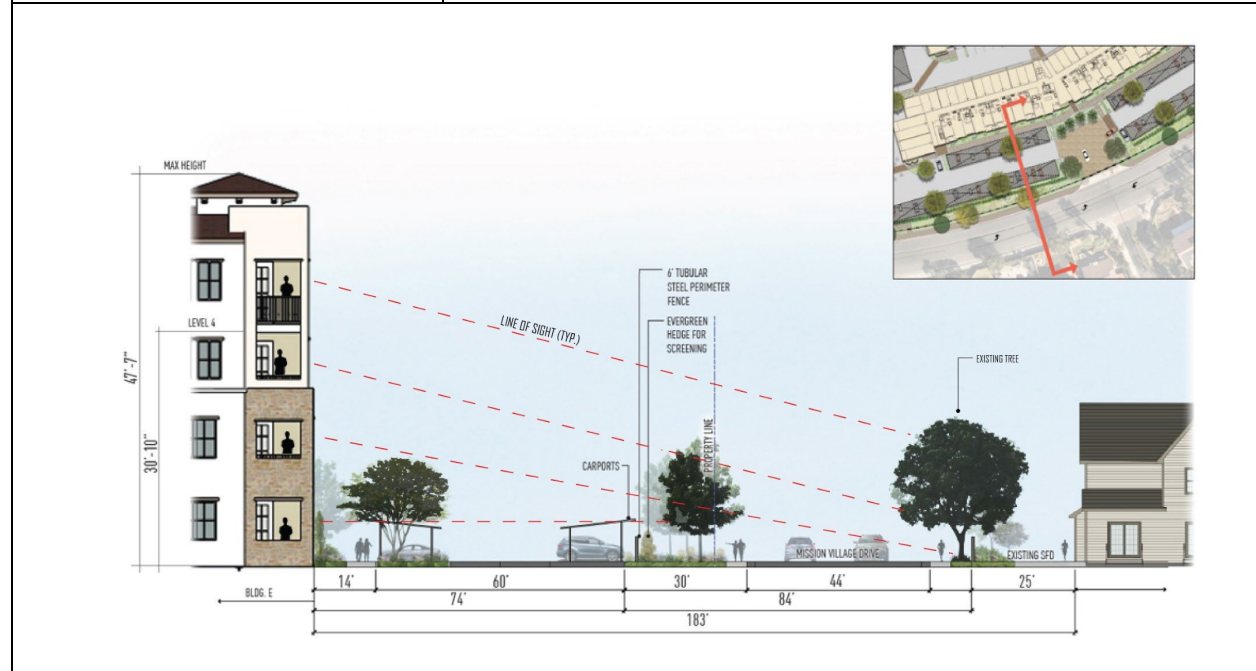
	<p>period, which was held at the City’s July 18, 2024 Planning Commission meeting.</p> <p>The proposed Project Applicant sent postcards to a total of 768 neighbors, many of whom extended beyond a 1,000-foot radius, which exceeded the 300-foot noticing radius employed by the City. The Applicant additionally hosted Open House Community Meeting on September 12<sup>th</sup>, 2023, in a vacant space within the Mission Grove Plaza (Unit 1C). In addition, the proposed Project Applicant hosted the Mission Grove Neighborhood Alliance’s (MGNA) monthly meeting on October 9<sup>th</sup>, 2023 at the Mission Grove Plaza and provided refreshments and seating for 163 attendees. Prior to hosting the October 9<sup>th</sup>, 2023, MGNA meeting, the proposed Project Applicant attended the September 11<sup>th</sup>, 2023 MGNA meeting to extend the invitation to host the following month’s meeting. Moreover, the proposed Project Applicant attended the May 29<sup>th</sup>, 2024 MGNA meeting at the Canyon Crest Country Club to engage with MGNA executive committee prior to the DEIR public comment period deadline. The Project Applicant also met with two MGNA members on June 11, 2024. Thus, the proposed Project Applicant has put forth several efforts both before and during the DEIR public review period to notify and engage with the public and local community, providing the public with multiple opportunities to participate in the Project’s planning and development process.</p> <p>The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>
<p><b>2. Aesthetics</b></p>	
<p>What landscaping plans have been developed to soften the visual impact of the project and enhance its integration with the existing environment?</p>	<p>Response:</p> <p>As outlined in the DEIR, in Section 5.1 Aesthetics (pp. 5.1-1 - 5.1-24) the Project will have a variety of landscaping styles that would help decrease the “visual impact” of the project. The proposed Project would incorporate a variety of aesthetic improvements such as planting trees along walkways, lighting for nighttime safety, fencing and walls</p>
<p>How does the project's height, massing, and scale compare to the existing buildings in the</p>	

<p>area, and what measures will be taken to mitigate any potential negative visual impacts?</p> <p>What environmental considerations have been made to ensure the project does not negatively impact the surrounding residential neighborhoods?</p> <p>How will the project contribute to the overall aesthetics and urban design of the Mission Grove area?</p>	<p>designed to increase the development's aesthetics, and open space areas for residents.</p> <p>The Project's design, including the proposed height and layout, has been assessed for its visual and community impacts in Section 5.1 Aesthetics (pp. 5.1-1 - 5.1-24). The analysis includes considerations of the Project's fit within the existing Mission Grove Specific Plan and addresses potential visual impacts and community concerns.</p> <p>The DEIR addresses the compatibility of the proposed Project with the surrounding area in Section 5.1 Aesthetics (pp. 5.1-2 - 5.1-3), including considerations of building height and visual character. The Project's proposed buildings are designed to align with the City's broader planning goals, even if there are no similar structures immediately adjacent to the Project site.</p> <p>The proposed Project includes buildings that are taller than the existing structures in the immediate vicinity, however the proposed Project's maximum height of 57 feet 2 inches would be below the maximum height of 60 feet allowed within the CR zoning. This does not conflict with the City's long-term planning objectives, which may include accommodating higher density development in specific areas. The Project aims to provide high-quality residential units in an area designated for development, contributing to the City's goals of increasing urban density and housing availability. Taller buildings can accommodate more residents within a smaller footprint, promoting efficient use of land and infrastructure.</p> <p>As outlined in the rendering below, the closest apartment building and the closest single-family residence are located 183 feet apart and separated by Mission Village Drive. The line of sight between the apartment building and the nearby residences is broken up with the following: sidewalk, landscaping, parking, carports, fencing and evergreen hedge screening at the apartment development, trees within the landscaping buffer/setback on the north side of Mission Village Drive, Mission Village Drive, and a sidewalk, landscaping and block wall on the south side of Mission Village Drive. The distance between the apartment buildings and the nearest residences as well as trees, fencing and</p>
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block wall reduce the visibility of the nearby single-family residences by the apartment tenants and vice versa.

The DEIR addresses the Project's buildout, which is recorded under Section 3.0 Project Description (pp. 3.0-15 - 3.0-17), and its visual impacts within Section 5.1 Aesthetics (pp. 5.1-1 - 5.1-24), which found that potential impacts from the Project would be "less than significant impact" and therefore no mitigation would be required.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.



**3. Air Quality**

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?

Response:

The DEIR addresses the concerns of Air Quality within Section 5.3 Air Quality (pp. 5.3-1 - 5.3-29), and its analysis is based on data and modeling in the Air Quality, Greenhouse Gas Emissions, and Energy Impact Analysis Memorandum for the Proposed Mission Grove Apartments Project in Riverside, California, prepared by LSA

<p>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?</p>	<p>Associates, Inc. (LSA 2023; Appendix B). This detailed analysis considered the result of the proposed Project's effect to significantly impact existing and applicable air quality plans to have a significant net increase of pollutants, whether it may expose sensitive communities or result in emissions or odors that would adversely affect a substantial number of people. The proposed Project was determined to be less than significant for all of the above potential impacts.</p>
<p>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?</p>	<p>This analysis incorporated mitigation to reduce vehicle miles traveled by incentivizing public transportation, electric vehicle charging stations, pedestrian improvements, subsidizing public transportation, traffic calming measures, and car/ride-sharing programs (see Vehicle Miles Traveled Analysis prepared by LSA (April 2023) and the Traffic Operational Analysis, also prepared by LSA (December 2022); these analyses are contained in Appendix I).</p>
<p>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?</p>	<p>As outlined above, the EIR analysis is based on the Project specific Air Quality, Greenhouse Gas Emissions, and Energy Impact Analysis Memorandum for the proposed Project (LSA 2023; Appendix B), which was based on the Project generated traffic identified in the Project's Traffic Operational Analysis. The nearest sensitive receptors to the proposed Project site are the single-family residential units approximately 115 feet to the south of the site boundary (p. 5.3-26). As concluded in DEIR Section 5.3 Air Quality (pp. 5.3-26 – 5.3-27), the proposed Project would not expose sensitive receptors to substantial pollutant concentrations. As the Project would not expose sensitive receptors closest to the Project site, it also would not expose other sensitive receptors that are further away (including schools, hospitals, and other residential areas). In addition, as outlined in the DEIR Section 5.3 Air Quality (p. 5.3-26) the Project's construction and operation trips would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment of applicable Federal or State Ambient Air Quality Standards (AAQS), which are the air pollutants known to be hazardous to human health. Therefore, as the proposed Project would not expose nearby sensitive receptors to substantial pollutant concentrations or criteria pollutants and the effects would be less than significant.</p> <p>The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new</p>

	<p>information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.</p>
<p><b>4. Energy</b></p>	
<p>What renewable energy sources, if any, are being considered for integration into the project to reduce reliance on non-renewable resources?</p>	<p>Response:</p> <p>The DEIR thoroughly addresses concerns regarding energy consumption efficiency and considerations for non-reliance on non-renewable resources (such as coal, natural gas, and oil) within Section 5.6 Energy (pp. 5.6-1 - 5.6-18), and an analysis of the potential energy use of the Project during operation as well as its construction is found in Appendix B as Air Quality, Greenhouse Gas Emissions, and Energy Impact Analysis Memorandum for the proposed Mission Grove Apartments Project prepared by LSA Associates. (LSA 2023).</p> <p>The Project includes photovoltaic/solar to reduce reliance on non-renewable resources. The DEIR discusses how the proposed Project would incorporate energy reduction measures as well as the use of a photovoltaic/solar system to assist with power needs in the development. The proposed Project would adhere to applicable California Code Title 24, Part 6 energy efficiency standards as described in Section 5.6.2.2 of the DEIR (p. 5.6-6).</p> <p>A detailed analysis of the Project’s demand for non-renewable energy resources from construction and operation of the Project was conducted and is provided in Appendix B of the DEIR and the results summarized in Section 5.6 Energy of the DEIR (pp. 5.6-1 – 5.6-18).</p> <p>The estimated construction fuel usage is 14,906 gallons.</p> <p>The estimated annual Project operational use of gasoline is 176,738 gallons/year, of diesel is 126,865 gallons/year, and natural gas is 473,806 thousand British thermal units (kBTU)/year.</p> <p>In addition to compliance with existing energy guidelines and plans, the project would reduce use of natural gas to only the outside amenities and residences would have electric power instead.</p>
<p>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?</p>	
<p>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?</p>	

	<p>Analysis shows that the footprint, given the energy reduction measures the project will implement, the electricity demand associated with the Project, not including the amount generated and offset by solar energy, would be approximately less than 0.01 percent of Riverside County's total electricity demand. An increase in cooling needs for the Project's residents would not increase energy needs to a significant level.</p> <p>The comments do not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>
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**5. Land Use and Planning**

<p>How will the proposed mixed-use development ensure compatibility with the Mission Grove Plaza Shopping Center's commercial uses?</p>	<p>Response:</p> <p>As defined in the Riverside Municipal Code (RMC) Chapter 19.120, <i>the MU-U Zone provides for opportunities for primarily high-density residential development with commercial, office, institutional, and business uses emphasizing retail, entertainment, and student-oriented activities. Such development is intended to facilitate the grouping of innovative housing options with employment uses entertainment activities, and public gathering spaces, transit stations and other community amenities, such as art in public spaces. The focus of the development and design standards is on ensuring that large-scale mixed-use projects are functionally integrated through the relationships between location and type of uses and structures, the efficient use of land, optimal site planning and design elements.</i></p> <p>The proposed MU-U zone is a horizontal mixed-use between the apartment buildings and the adjacent shopping center, within the Mission Grove Plaza, as compared to a vertical mixed-use with commercial/retail on the bottom floor and residential on above floor(s) in the same building. RMC Chapter 19.120 allows for either singular, stand-alone uses that contribute to a mixture of uses within the zone or combined uses in one project as a mixed-use. The proposed Project is the stand-alone use that contributes to the mixture of uses within the zone.</p>
<p>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?</p>	
<p>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?</p>	
<p>How does the proposed project plan to address potential concerns from residents regarding the integration of high-density</p>	



<p>residential units into an area currently zoned for commercial retail, particularly in terms of maintaining community cohesion and character?</p>	<p>The project has been designed to be consistent with the purpose of the Mixed-Use Zone as follows:</p> <ul style="list-style-type: none"> <li>• To encourage a mixture of compatible and synergistic land uses, such as residential with compatible nonresidential uses including office, retail, personal services, public spaces and other community amenities;</li> <li>• To strengthen the interaction between residential, commercial and employment uses in order to reduce dependency on automobiles, improve air quality, decrease urban sprawl, facilitate use of transit and encourage conservation of land resources;</li> <li>• To revitalize deteriorating commercial areas by integrating residential uses into the commercial fabric to create an active street life and enhance the vitality of businesses;</li> <li>• To foster pedestrian-oriented activity nodes by providing a mix of uses in compact walkable areas;</li> <li>• To increase the area available for residential development and provide alternative types of housing;</li> <li>• To encourage medium- and high-density residential development to occur in close proximity to employment and services; and</li> <li>• To allow for a greater variety of land uses and structures, including flexibility in site planning.</li> </ul> <p>As designed, the project strengthens the interaction between the proposed mix of uses, creating a pedestrian-oriented environment while ensuring the overall design and proposed uses are compatible with uses in the surrounding neighborhoods by incorporating enhanced pedestrian connections to adjacent commercial uses, and siting buildings further from existing single-family residential to the south. As proposed the project is consistent with the purpose and all applicable development standards in the zoning code (RMC).</p> <p>Through the design review process, City staff has worked with the applicant to make sure the Project smoothly integrates its high-density residential units into the commercial shopping center and maintains the community character without negatively impacting the existing community structure.</p>
<p>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?</p>	
<p>How will the realignment of parcel lines in the southwest and southeast corners impact the overall development and existing infrastructure?</p>	
<p>Will there be any changes in zoning or land use regulations for the newly created parcels, and if so, what are they?</p>	
<p>How will the subdivision affect the operations and accessibility of the existing Mission Grove shopping center?</p>	
<p>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</p>	

negative impacts identified in the EIR?	The proposed General Plan Amendment and zoning change allows the redevelopment of a closed retail store into much needed housing. The benefit to the community from the Project is a new option for housing in the area and a new source of patrons for the existing businesses in the shopping center.
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?	The Project proposes a Parcel Map (No. 38598) to subdivide the 19.27-acre Parcel 1 of Parcel Map 36320 into two parcels (Parcel 1 – 9.92 acres, Parcel 2 – 9.35 acres) for financing and conveyance purposes. As proposed, the Parcel Map meets the minimum standards of the Subdivision Code (Title 18) and lot standards of the MU-U – Mixed Use-Urban Zone. The General Plan Amendment, zoning change and Specific Plan Amendment will apply only to the Project's Parcel 1 of 9.92 acres. The subdivision will not affect the existing infrastructure, accessibility, or operations of the Mission Grove Plaza (shopping center). The City staff reviews the proposed subdivision to ensure it complies with all applicable City, state, and federal regulations.
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?	Rezoning and redevelopment of the proposed Project site would serve to increase the type and amount of housing available, consistent with the goals of the City's Housing Element, and would assist the City in meeting housing demand as part of the City's growth projections (p. 5.11-10).
How does the subdivision support the overall goals and vision of the proposed Mixed Use-Urban development?	As outlined in the DEIR, Section 5.11 Land Use and Planning, Table 5.11-1 Consistency with Applicable General Plan Policies, (pp. 5.1-12 - 5.11-52), the Project includes paved walkways and marked crosswalks throughout the Project site for resident paths of travel. These residential paths of travel would connect to existing public paths of travel, such as the sidewalks along Mission Grove Parkway and Mission Village Drive, which would create walkable and bikeable connectivity between the Project's residential uses and surrounding existing shopping center uses.
What steps are being taken to ensure that the subdivision process is compliant with all local, state, and federal regulations?	The Project does not propose "low-income housing"/affordable housing under the definition made by the California Department of Housing and Community Development. Low-income housing is not identified as part of the Project per DEIR Section 3.0 Project Description (p. 3.0-23).
What measures are being taken to ensure affordable housing options are included in the proposed apartment project?	
What strategies will be implemented to mitigate potential conflicts between residential and retail activities	

<p>within the mixed-use environment?</p>	<p>No conflicts were identified in the DEIR between the proposed Project and the adjacent commercial retail uses and therefore, no mitigation measures are required.</p> <p>The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>
<p><b>6. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan</b></p>	
<p>What specific aspects of the project’s density were flagged as inconsistent by the Air Force?</p>	<p>Response:</p> <p>The DEIR considers the proximity of the Project to the March Air Reserve Base/Inland Port Airport (MARB/ IPA) and evaluates the potential safety hazards associated with this proximity. The detailed analysis is provided in Section 5.9 Hazards and Hazardous Materials (pp. 5.9-14 - 5.9-24), as well as Section 5.11 Land Use and Planning (pp. 5.11-54 - 5.11-64). The analysis in the DEIR related to MARB/ IPA is based on the MARB/IPA Land Use Compatibility Plan, the Riverside County Airport Land Use Commission (ALUC) Staff Report prepared for the Project (Case Number ZAP1548MA22), dated September 14, 2023 and the Riverside County ALUC Development Review Letter for the Project. The Riverside County ALUC is the lead agency responsible for airport land use compatibility planning in Riverside County and its fundamental purpose is the orderly expansion of airports and adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards around public airports.</p> <p>The DEIR concludes that the Project would have a significant and unavoidable impact under Threshold E because it is located within the vicinity of the March Air Reserve Base/Inland Port Airport and exceeds the maximum allowed density of 6 dwelling units per acre (du/ac). Due to this, the proposed location poses potential safety hazards for residents and workers in the Project area due to the increased risk of more people concentrated in an area that may have an emergency landing and/or potential aircraft crash at the Project site.</p>
<p>How does the Air Force define “inconsistent density” in the context of this project?</p>	
<p>Were there any proposed solutions or mitigation measures suggested to address the density concerns?</p>	
<p>What steps are being taken to ensure compliance with ALUC’s recommendation?</p>	
<p>What impact could inconsistent density have on the base’s operations or surrounding community?</p>	
<p>How does the inconsistency affect the overall mission readiness of the Air Force at March Air Reserve Base?</p>	

As outlined in the DEIR, Section 5.9 Hazards and Hazardous Materials (p. 5.9-19), the Project will comply with the recommended ALUC conditions of approval, including restriction on outdoor lighting, prohibited uses, and notices and informational brochures for prospective purchasers and tenants. The Project will also comply with recommended conditions related to light and glare with minor modifications, to ensure safety but allow for flexibility in the final design of the Project's solar panels. These are City of Riverside Conditions of Approval for the Project.

The determination of significant and unavoidable impacts under Threshold E is based on the finding that although the Project is otherwise wholly consistent with all other criteria, it is inconsistent with one applicable MARB/ IPA LUCP land use compatibility criteria, the residential density criteria for Zone C2. There are no feasible mitigation measures that would reduce impacts related to inconsistency with the residential density criteria. The Project is allowed to be considered under CEQA regulations, which permit the approval of projects with significant and unavoidable impacts if a Statement of Overriding Considerations is adopted, demonstrating that the benefits of the Project outweigh these impacts.

As discussed in the DEIR, Section 7.0 Alternatives, an alternative with a lower density multi-family residential project consistent with ALUC density criteria was evaluated as Alternative #2. (pp. 7.0-1 - 7.0-30)

No specific comments directly from the Air Force were provided to the City. The ALUC Consistency with MARB/IPA Analysis and Findings, from the Staff Report is included in the DEIR (pp. 5.9-14 - 5.9-17), as follows, but no additional detail provided.

March Air Reserve Base/United States Air Force Input

Given that the project site is located in Zone C2 westerly of the northerly runway at March Air Reserve Base, the Base staff was notified of the project, and sent plans and the solar glare hazard study for their review. On July 31, 2023, the Air Force provided comments supporting ALUC's recommendation of inconsistency due to concerns with the project's inconsistent density.

The analysis of consistency with residential density is based on safety factors to limit the potential risk of an off-field

	<p>aircraft landing, i.e. emergency landing at the Project site and does not relate to the overall mission and readiness of the Air Force and MARB.</p> <p>As further outlined in Appendix O – Johnson Aviation Consulting Technical Memorandum, Mission Grove Apartments Project – Response to ALUC Comment on City’s Intent to Overrule, the ALUC letter cites three main comments in response to the City’s Findings of the intent to overrule resolution. These same comments are echoed in the Caltrans letter. The three comments all focus on the proposed residential density and purport that the density introduces a new safety risk beyond that which already exists with the current commercial land use designation. The Project will not affect the orderly expansion of the March ARB. It is located 3.3 miles from the closest point on Runway 14/32 and surrounded by fully developed, existing residential and commercial land uses. The Project site is in a dense, urban neighborhood that is more than 9,300 feet west of the nearest point of Runway 14 Accident Potential Zone II (APZ-II) and has coexisted with the Airport for decades with no aircraft accidents or incidents within the Compatibility Zone C2. The existing commercial land use designation allows for more intense use and people per acre than the Project’s proposed density (p. 3). The Project’s average intensity would be 123 people per acre or approximately 61.3 percent of the allowable 200 people per acre commercial average intensity in Compatibility Zone C2 (p.5). No actual safety risk has been documented by ALUC within the ALUCP or the ALUC Staff Report for the Project (p. 5).</p> <p>The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>
<b>7. Noise</b>	
<p>What study did you use to determine the reduction with the "shielding"?</p>	<p>Response:</p> <p>As outlined in the DEIR Section 5.13 Noise (pp. 5.13-1 - 5.13-27), a detailed Project specific Noise and Vibration</p>

<p>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?</p>	<p>Impact Analysis was prepared for the proposed Project and was included in the EIR in Appendix H. Table G in the Project specific Noise and Vibration Impact Analysis identifies the City of Riverside Maximum Noise Level Standards for types of land uses, whether exterior or interior, and for various specified time periods.</p> <p>For noise sources that are generally constant, such as HVAC equipment, the RMC allows an up to 5 dBA increase from the noise standard for noise levels that occur for a cumulative period of more than 30 minutes in any hour, which is identified as L<sub>50</sub> (exterior). The L<sub>50</sub> (exterior) standard is applicable to noise sources that are generally constant, such as HVAC equipment. Therefore, the City's exterior daytime and nighttime 30-minute noise standards are 55-60 dBA and 45-50 dBA, respectively, for residential uses. Based on the analysis in the Project specific Noise and Vibration Impact Analysis, which is summarized in the DEIR Section 5.13 Noise, Noise is not exceeded at nearest sensitive receptors from the Project's HVAC equipment.</p> <p>The nighttime noise standard of 45 dBA L<sub>max</sub> (anytime) is an interior noise standard. The L<sub>max</sub> (anytime) noise standard applies to noise sources that generate instantaneous maximum noise levels. The exterior-to-interior noise reduction for residential structures with standard construction is 20-25 dBA. Interior noise levels at the closest residence would not exceed the nighttime noise standard of 45 dBA L<sub>max</sub> (anytime).</p> <p>The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>
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**8. Parking**

<p>What parking solutions are being considered to accommodate the needs of both the new residential units and the existing retail establishments?</p>	<p>Response:</p> <p>The Zoning Code requires a total of 513 parking spaces for this project. Due to the mixed-use context of the proposed Project, as outlined in the DEIR Section 3.0 Project Description (p. 3.0-16), the Project includes 604 parking spaces and of these, 513 will be dedicated for the</p>
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<p>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?</p>	<p>apartments and 91 will be shared between the proposed apartments and the existing adjacent retail.</p>
<p>What measures are you taking to ensure that this parking strategy doesn't result in increased on-street parking in surrounding neighborhoods?</p>	<p>As outlined in the DEIR, Section 5.17 Transportation (p. 5.17-8) Riverside Transit Authority (RTA) bus routes 20 and 22 currently serve the project area with bus stops along Alessandro Boulevard and Mission Grove Parkway South adjacent to the Project site. There is currently an existing bus stop located approximately 265 feet north of the intersection of Mission Grove Parkway/Mission Village Drive for the southbound directions of the routes. This bus stop will be relocated approximately 200 feet north of the existing location as part of the project.</p>
<p>How do you plan to communicate this parking policy to potential residents, and what strategies will you use to encourage single-car households?</p>	<p>Please refer to topical response transportation/VMT for discussion of strategies to reduce trips/VMT by the residents of the Project. Mitigation Measure MM TRANS-4, included in the EIR Section 5.17 Transportation (pp. 5.17-22 - 5.17-23), the Project would implement a subsidized transit pass program that would provide up to \$60 for an RTA monthly bus pass or up to \$100 for a monthly Metrolink pass.</p>
<p>Are you incorporating any smart parking technologies or systems to manage and optimize parking usage within the development?</p>	<p>In DEIR Section 5.8 Greenhouse Gas Emissions, several reduction measures to decrease the need for vehicle reliance and increase walkability are listed in Table 5.8-7 RRG-CAP (Riverside Restorative Growthprint – Climate Action Plan) Project Consistency (p. 5.8-35), such as:</p>
<p>How flexible is your parking plan? Can you adapt the number of available spaces or pricing structure if demand patterns change over time?</p>	<ul style="list-style-type: none"> <li>• Creation of pedestrian network improvements</li> <li>• Providing traffic calming measures</li> <li>• Car sharing programs</li> <li>• Increasing transit service frequency/speed</li> <li>• Encouragement of telecommuting</li> <li>• Providing Electric Vehicle parking and charging infrastructure.</li> </ul>
<p>Have you considered offering any incentives for residents who choose not to use their included parking space, such as reduced rent or alternative amenities?</p>	<p>Additionally, the goal of the DEIR is not to analyze economic assessments or impacts that the project may have, as CEQA does not require it.</p>
<p>What provisions are you making for visitor parking</p>	<p>The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>

under this unbundled parking scheme?	
<b>9. Public Services</b>	
<p>What measures will be taken to ensure that the subdivision does not disrupt existing utilities and services within the area?</p>	<p>Response:</p> <p>Please refer to DEIR Section 5.15.6 Public Services, subsection Environmental Impacts, Threshold A discussion/analysis (p.5.15-5). The DEIR discusses that the proposed Project would not result in significant impacts regarding public services/access to public services and no mitigation measures are required.</p> <p>Additionally, please refer to DEIR Section 5.19.5 Environmental Impacts, Threshold discussions A through D (pp. 5.19-14 - 5.19-20). The DEIR discusses that the proposed Project would not result in significant impacts regarding use, capacity, or access to utilities and no mitigation measures are required.</p> <p>The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>
<b>10. Transportation/ VMT</b>	
<p>How will the project address potential traffic congestion at the intersections of Mission Grove Parkway, Alessandro Boulevard, and Mission Village Drive?</p>	<p>Response:</p> <p>The DEIR includes a detailed analysis of Vehicle Miles Traveled (VMT) reductions, which can be found in Appendix I (Traffic Operation Analysis and VMT). The VMT reductions were calculated using established methodologies that consider the Project's location, land use mix, proximity to public transit, and implementation of various Transportation Demand Management (TDM) measures. These factors collectively contribute to a decrease in the need for car trips, thus reducing overall VMT. The study area for the Project was finalized based on the criteria defined in the City of Riverside Public Works Department Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level of Service (LOS) Assessment (dated July 2020). Based on the City's TIA Guidelines during the scoping agreement</p>
<p>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?</p>	



<p>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?</p>	<p>process, the study area includes 13 intersections and 13 roadway segments.</p>
<p>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?</p>	<p>The City of Riverside has various strategies and responsibilities to improve traffic flow in the area surrounding the Project. These include traffic signal synchronization, roadway improvements, public transit enhancements, and the development of bicycle and pedestrian infrastructure. These measures, implemented by the City, will contribute to improved traffic management and reduced congestion in the vicinity of the Project.</p>
<p>Have you considered partnering with local businesses or institutions to create shared transportation solutions that could further reduce VMT?</p>	<p>The Project incorporates a comprehensive set of TDM measures designed to reduce VMT and promote sustainable transportation options. These measures include enhancing pedestrian infrastructure to ensure safe and convenient walking routes within and around the Project site, and installing bicycle facilities such as bike racks and storage to encourage cycling as an alternative to driving. Improved access to existing bus stops and coordination with transit agencies aim to enhance public transportation services. The Project also supports carpool, vanpool, and school pool programs to reduce the number of single-occupancy vehicle trips and provides electric vehicle (EV) charging stations to promote the use of electric vehicles, further reducing VMT.</p>
<p>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?</p>	<p>Shared parking agreements with nearby businesses optimize the use of available parking spaces, and the encouragement of telecommuting options for residents reduces daily commuting trips. Additionally, the promotion of flexible work hours helps spread out peak travel times and reduce congestion. The implementation of commute trip reduction marketing and incentive programs for residents who use alternative modes of transportation, such as public transit passes or bike-share memberships, further support these goals.</p>
<p>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?</p>	<p>The DEIR addresses the Project's goal of encouraging walkability and enhancing pedestrian connectivity in Section 3.0 Project Description (pp 3.0-23 - 3.0-24). The Project includes design features aimed at promoting walkability and bicycle use, such as pedestrian pathways, bicycle lanes, and connections to existing sidewalks and bike routes.</p>
<p>There are no public facilities such as libraries, universities or community colleges within walking distance. You claim</p>	<p>The DEIR addresses the Project's goal of encouraging walkability and enhancing pedestrian connectivity in Section 3.0 Project Description (pp 3.0-23 - 3.0-24). The Project includes design features aimed at promoting walkability and bicycle use, such as pedestrian pathways, bicycle lanes, and connections to existing sidewalks and bike routes.</p>

<p>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.</p>	<p>These features are intended to create a more pedestrian-friendly environment and encourage alternative modes of transportation.</p>
<p>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?</p>	<p>While the goal of encouraging walkability is primarily focused on residents of the new development, the improvements to pedestrian and bicycle infrastructure will benefit the broader community, including nearby residents and visitors to the area. By enhancing the connectivity and safety of pedestrian and bicycle pathways, the Project aims to make walking and biking more attractive and viable options for everyone in the vicinity.</p>
<p>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?</p>	<p>The evidence supporting the potential increase in walking and biking to the existing shopping center and other nearby destinations is based on urban planning principles and studies that demonstrate how improved infrastructure can lead to increased use of non-motorized transportation. The DEIR includes references to these principles and provides a rationale for the anticipated benefits. For instance, the presence of well-designed pedestrian pathways and bicycle lanes has been shown to encourage more people to choose walking or biking over driving, as detailed in various urban planning studies cited in the DEIR.</p>
<p>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?</p>	<p>Furthermore, the Project aligns with the City's broader goals of promoting sustainable transportation and reducing vehicle miles traveled (VMT), as outlined in the City's General Plan and other planning documents. By improving the pedestrian and bicycle infrastructure, the Project contributes to these goals and enhances the overall walkability of the area.</p>
<p>Are there any innovative or cutting-edge VMT reduction strategies you're exploring that go beyond traditional TDM measures?</p>	<p>The DEIR addresses Policy AQ-1.5, which encourages infill development projects within urbanized areas that include job centers and transportation nodes. While the Project primarily consists of residential development, it is strategically located within close proximity to various existing commercial and retail businesses, effectively integrating with nearby job centers, thereby reducing dependency on automobiles.</p>
<p>How does your project's projected VMT compare to similar developments in the area, and what factors contribute to any differences?</p>	<p>The Project itself does not include new job centers within its development. However, it supports Policy AQ-1.5 by providing residents with easy access to nearby employment opportunities and transportation options. The Project site is adjacent to a bus stop with two bus lines along Mission</p>

	<p>Village Drive, enhancing connectivity to the broader urban area and facilitating access to job centers.</p> <p>The purpose of the EIR is not to compare the proposed project to other similar developments. The purpose of the EIR is to evaluate the project itself. This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>
<p><b>11. Utilities</b></p>	
<p>What measures will be taken to ensure that the subdivision does not disrupt existing utilities and services within the area?</p>	<p>Response:</p> <p>Please refer to DEIR Section 5.15.6 Public Services, subsection Environmental Impacts, Threshold A discussion/analysis (p.5.15-5). The DEIR discusses that the proposed Project would not result in significant impacts regarding public services/access to public services and no mitigation measures are required.</p>
<p>What infrastructure improvements are planned to support the increased demand from the new mixed-use development, such as water, sewer, and electrical systems?</p>	<p>Additionally, please refer to DEIR Section 5.19 Utilities and Service Systems, subsection 5.19.5 Environmental Impacts, Threshold discussions A through D (pp. 5.19-14 - 5.19-20). The DEIR discusses that the proposed Project would not result in significant impacts regarding use, capacity, or access to utilities and no mitigation measures are required.</p>
<p>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?</p>	<p>Further, please refer to the DEIR Section 5.19.5 Environmental Impacts Threshold A discussion (pp. 5.19-14 - 5.19-16). This DEIR section details what, if any, infrastructure improvements would be implemented for the proposed Project and concludes the proposed Project would not result in significant impacts regarding the potential relocation or construction of new or expanded facilities.</p> <p>The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>

<b>12. Alternatives</b>	
How did you determine the range of alternatives to be analyzed in the EIR?	<p>Response:</p> <p>As discussed in DEIR Section 7.0 Alternatives to the Proposed Project (p. 7.0-1), Section 15126.6 of the CEQA Guidelines identifies parameters within which to consider proposed project alternatives. These parameters include alternatives that are potentially feasible, reduce significant impacts, and which attain most of the basic objectives of the proposed project. The City, as lead agency, is responsible for selecting a range of Project alternatives. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative. (CEQA Guidelines Section 15126.6(f)(1)). (p. 7.0-2)</p> <p>As outlined in the DEIR, Section 7.0.2 Rationale for Alternative Selection, the “No Project” alternative is required by CEQA (State CEQA Guidelines, Section 15126.6(e)). The No Project alternative is no redevelopment of the site. As the Project is not consistent with the designated land use and zoning for the site, the “no project” alternative (Alternative 1) would retain the existing development of the site that remains in accord with the current land use and zoning designation and the Mission Grove Specific Plan. Under this alternative, the GP land use designation of C – Commercial and zoning of CR – SP – Commercial Retail as well as Specific Plan (Mission Grove) designation as Retail Business &amp; Office and CR – SP Commercial Retail Overlay Zone would remain as is. Alternative 2 was selected to include lower density multi-family residential use/development that would be consistent with the density criteria for the C2 Compatibility Zone of the March Air Reserve Base/ Inland Port ALUC Plan. Alternative 3 was selected as the Project site has existing retail development, to continue to use the site as permanent retail. Alternative 4 was selected for re-development of the proposed 347 residential unit development at an off-site location within the</p>
Can you explain the process and criteria used to ensure a “reasonable range” was considered?	
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?	
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?	
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 do each of the analyzed alternatives specifically address the significant effects identified for the proposed project?	

<p>Are there any alternatives that would require changes to existing zoning or land use designations? If so, how feasible are these changes?</p>	<p>City of Riverside. (p. 7.0-2) There were no alternatives identified by the public or agencies in response to the Notice of Preparation (NOP) of the EIR or in the scoping meeting.</p>
<p>Were any off-site alternatives considered? If so, what factors were evaluated in determining their feasibility?</p>	<p>Alternative 2 – Reduced Density Apartment Redevelopment (p. 7.0-9) was selected as an alternative with the highest density that would meet the density criteria of the C2 zone (58 dwelling units). This reduced density alternative would allow the proposed residential development to be consistent with the Compatibility Zone C2 allowable residential density, and thus fully consistent with the MARB/IPA LUCP. It would also be consistent with most of the applicable GP 2025 objectives and policies.</p>
<p>Can you explain how the "rule of reason" was applied in selecting the alternatives for detailed analysis?</p>	<p>A 16 dwelling units per acre mixed-use alternative was not analyzed for the DEIR. As discussed in DEIR Section 7.02 Rationale for Alternative Selection (p. 7.0-2), per the State CEQA Guidelines, an EIR “need not consider every conceivable alternative to a project.” A reduced density alternative with a density higher than 58 units was not considered as it would not eliminate the significant impacts of being inconsistent with MARB/ IPA ALUCP and GP 2025 objectives and policies.</p>
<p>How do the alternatives address cumulative impacts identified in the EIR, particularly those that may be significant and unavoidable?</p>	<p>Section 7.0 Alternatives to the Proposed Project of the DEIR includes a detailed and thorough analysis of each of the alternatives, what the potential impacts of the alternative would be for each environmental topic area analyzed in the DEIR (Aesthetics, Agricultura and Forestry Resources, Air Quality, etc.), and if the alternative would have significant effects, including cumulative, as compared to those identified for the proposed Project. (pp. 7.0-1 – 7.0 – 30)</p>
<p>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?</p>	<p>Regarding the zoning changes for alternatives to the project, Alternatives 2-, 3, and 4 would all require rezoning to allow the proposed Project.</p>
<p>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?</p>	<p>Alternative 4, which includes the proposed 347 residential apartment project at an offsite infill location, would serve to increase the type and amount of housing available, consistent with the goals of the City’s Housing Element, and would assist the City in meeting housing demand as part of the City’s growth projections. However, as Alternative 4 does not include a specific off-site location it is unknown whether Alternative 4 would be able to utilize existing infrastructure and transit corridors. If it were an infill location,</p>
<p>How would relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align</p>	<p>Alternative 4, which includes the proposed 347 residential apartment project at an offsite infill location, would serve to increase the type and amount of housing available, consistent with the goals of the City’s Housing Element, and would assist the City in meeting housing demand as part of the City’s growth projections. However, as Alternative 4 does not include a specific off-site location it is unknown whether Alternative 4 would be able to utilize existing infrastructure and transit corridors. If it were an infill location,</p>

with existing infrastructure and transit corridors?	it would be expected to utilize existing infrastructure, at least to some degree.
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?	<p>Refer above to topical response to comments regarding community outreach .</p> <p>The comments do not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.</p>
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?	
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.	
<b>13. Comments Not Related to EIR Analysis/ Not Required by CEQA</b>	
How will the proposed amendment impact the availability and variety of commercial services currently provided in the area?	<p>Response:</p> <p>These comments and questions do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As it does not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does it reflect on the adequacy or content of the DEIR, it is deemed not relevant to the EIR analysis. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead</p>
Is there a timeline for addressing the density concerns and implementing any necessary changes?	

<p>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?</p>	<p>agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detail contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, these comments and questions are noted for the record, however no response is required pursuant to CEQA and no changes to the DEIR are required based on them.</p>
<p>How will the proposed subdivision impact the existing property values and real estate market in the surrounding area?</p>	
<p>3.3-2: Zoning Code Amendment. 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.</p>	
<p>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?</p>	

<p>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?</p>	
<p>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?</p>	
<p>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?</p>	
<p>How will the project address potential future changes in energy regulations and standards to ensure long-term compliance and efficiency?</p>	
<p>What measures are being taken to educate and encourage future occupants or users of the project to adopt energy-efficient practices?</p>	
<p>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</p>	



<p>integrated into the project design?</p>	
<p>Section 3.0. 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.</p>	
<p>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? Putting a large high density residential project in the middle of a suburban neighborhood does not satisfy any of these principles.</p>	
<p>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</p>	

<p>expanding into less developed areas?</p>	
<p>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?</p>	
<p>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?</p>	
<p>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?</p>	
<p>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?</p>	
<p>Can you provide examples of similar projects where commercial spaces were successfully replaced with residential units, and what</p>	

<p>lessons from those projects will be applied to ensure the success of this development?</p>	
<p>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?</p>	
<p>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.</p>	
<p>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?</p>	

<p>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?</p>	
<p>Are there any historical precedents or similar cases where density issues were resolved successfully?</p>	
<p>What specific benefits does the developer anticipate the new Mixed Use- Urban designation will bring to the community compared to the existing Commercial designation?</p>	
<p>What plans are in place to address potential concerns from residents of the multi-family residences to the north regarding increased density and activity?</p>	
<p>What types of residential uses (e.g., rental apartments, condominiums, affordable housing) are planned under the Mixed Use-Urban designation?</p>	
<p>What steps will be taken to ensure a smooth transition for existing businesses and</p>	

<p>landowners affected by the General Plan Amendment?</p>	
<p>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?</p>	
<p>VMT will not change under the Project planning (specific and unavoidable impacts). Is it possible for this issue to be specifically voted on by the City County (apart from the Project) and/or can a City ordinance be put on the ballot for the public to be made aware and approve? If not, why? Would a public generated referendum qualify for a ballot initiative?</p>	

## 2.3 Organization of Comment Letters and Responses

This section presents a list of comment letters received on the DEIR and describes the organization of the letters and comments that are provided in Section 3, Comments and Responses, of this document.

Each comment letter has been numbered sequentially and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue, as identified in the bracketing/numbering of each comment. For example, Response 1.1 indicates that the response is for the first issue raised in comment Letter 1.

**Table 2.3-1 – DEIR Comment Letters Received**

Letter Number and Commenter	Agency/Group/Organization/Individual	Page Number
1 Dave Kereazis	California Department of Toxic Substances Control	2.0-31
2 Vincent Ray	California Department of Transportation Division of Transportation Planning, Aeronautics Division	2.0-38
3 Xitlaly Madrigal	Agua Caliente Band of Cahuilla Indians	2.0-44
4 John Farnsworth	Community Member	2.0-47
5 Laura Sandidge	Community Member	2.0-147
Various (209)	Mission Grove Neighborhood Alliance	Appendix K
7 Chris Bardeen	Community Member	2.0-181
8 Mike McCarthy	Community Member	2.0-193
<b>Comment Letters Received After Close of the DEIR Comment Review Period</b>		
6 Pam O'Neill	Mission Grove Neighborhood Alliance	2.0-176

## 2.4 Comments and Responses

Written responses to each comment letter received on the DEIR are provided in this section. All letters received on the DEIR are provided in their entirety, followed by responses to the comments contained in the letters.

**Comment Letter 1 – Department of Toxic Substances Control**

Comment Letter 1 commences on the next page.



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

June 13, 2024

Veronica Hernandez  
Senior Planner, City of Riverside  
Community and Economic Development, Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522  
[vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov)

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MISSION GROVE  
APARTMENTS PROJECT, DATED MAY 9, 2024 STATE CLEARINGHOUSE NUMBER  
[2022100610](#)

Dear Veronica Hernandez,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the Mission Grove Apartments project (project). The proposed project site is part of the 70-acre Mission Grove Plaza Shopping Center and is currently developed with a 104,231 square foot vacant retail building and an associated surface parking lot. The proposed project includes a total of 347 studios, 1-, 2-, and 3-bedroom residential apartment units within five, 4-story buildings. The project will include indoor amenities including a leasing office, clubroom, fitness center, and outdoor amenities including a pool and spa, outdoor seating and dining areas, and a dog park. The entitlements for the project include: a General Plan Amendment (GPA) to change the land use designation from Commercial to Mixed Use-Urban, to allow residential use; a Zoning Code Amendment to change the zoning from Commercial



Veronica Hernandez  
June 13, 2024  
Page 2

Retail and Specific Plan Overlay Zones to Mixed Use-Urban and Specific Plan Overlay Zones; a Specific Plan Amendment to revise the Mission Grove Specific Plan; a Design Review for the proposed site design and building elevations; a Tentative Parcel Map No. 38598 to subdivide an existing parcel into two parcels for financing and conveyance purposes; and an EIR.

DTSC recommends and requests consideration of the following comments:

- 1.1 { 1. The EIR should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
- 1.2 { 2. DTSC recommends the City of Riverside Community and Economic Development, Planning Division utilize an approved oversight on the [Certified Local Agencies](#) list or enter into DTSC’s Standard Voluntary Agreement (SVA) program so a proper evaluation of the project is completed. If entering into an SVA with DTSC, the [FLUXX portal link](#) is provided and the page also has a link to the [Fluxx User Guide](#) that can help you navigate the system. You will need to create a new profile and once in the system, click “Start a Request for Lead Agency Oversight Application. If you have any questions about the application portal, please contact the DTSC Brownfield Coordinator [Gregory Shaffer](#) or contact the [Application Portal Inbox](#).
- 1.3 { 3. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within DTSC’s and U.S. Environmental Protection Agency (USEPA) Regional Screen Levels (RSLs) for the intended land use. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill

- 1.3 { material meets screening levels outlined in the [Preliminary Endangerment Assessment Guidance Manual](#) for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).
- 1.4 { 4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).

DTSC appreciates the opportunity to comment on the DEIR for the Mission Grove Apartments project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

*Dave Kereazis*

Dave Kereazis  
Associate Environmental Planner  
HWMP-Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Veronica Hernandez  
June 13, 2024  
Page 4

cc: (via email)

Governor's Office of Planning and  
Research State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)

Scott Wiley  
Associate Governmental Program Analyst  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Scott.Wiley@dtsc.ca.gov](mailto:Scott.Wiley@dtsc.ca.gov)

## **Letter 1 – California Department of Toxic Substances Control**

**Commenter:** Dave Kereazis, Associate Environmental Planner

**Date:** June 13, 2024

### **Response 1.1:**

The commenter states that the proposed Project may have a potential for historic or future activities on or near the project site to release hazardous waste/substances on the project site as well as requesting the EIR to provide what agencies would be responsible for providing oversight to these potential contaminations.

As outlined in the DEIR, Section 5.9 Hazards and Hazardous Materials, pp. 5.9-10 - 5.9-13, the EIR did acknowledge the potential for release of hazardous wastes/substances. Both Phase I and II Environmental Site Assessments (ESAs) were conducted. The Phase I ESA determined that no on-site Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs), or Controlled Recognized Environmental Conditions (CRECs) were identified. No other off-site RECs, HRECs, or CRECs were identified.

The Phase II ESA concluded that the off-site RECs listed in the Phase I report do not appear to have environmentally impacted the locations of the proposed buildings at the Project site, and no further actions were recommended as part of the Phase II ESA. Therefore, the required investigations (ESAs) have already been completed as part of the EIR and no further action (such as remediation) was recommended.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

### **Response 1.2:**

The commenter recommends that the lead agency utilize an approved oversight on the Certified Local Agencies list or enter into DTSC's Standard Voluntary Agreement (SVA) program.

Per the DTSC's website on Local Agency Resources (<https://dtsc.ca.gov/local-agency-resources/>) the list of Certified Local Agencies is for a project proponent seeking oversight from a local agency that is self-certified to provide oversight for environmental investigations and cleanup. The project proponent is not seeking oversight from a self-certified local agency for environmental investigations or clean up as clean up is not needed.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

### **Response 1.3:**

The commenter states concerns that the imported soils for the Project be documented for their origins, tested for contaminants, and if applicable soil sampling.

The City will issue a Condition of Approval for the project to provide documentation of the origin of any imported soil or fill material, and if applicable sampling be conducted to ensure that the imported soil and fill material meets screening levels outlined in the Preliminary Endangerment Assessment Guidance Manual for the intended land use.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 1.4:**

The commenter expresses concerns that before the demolition of any structures within the Project area a survey should be conducted to identify the presence of any lead- based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. California banned the use of asbestos as a painting and patching material in 1977 and the use of lead-based paint products was banned federally in 1978. As the K-Mart building was constructed in 1991, these materials are not expected.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Comment Letter 2 – California Department of Transportation, Division of Transportation Planning, Aeronautics Program**

Comment Letter 2 commences on the next page.

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

## California Department of Transportation

AERONAUTICS PROGRAM  
DIVISION OF TRANSPORTATION PLANNING  
P.O. BOX 942873, MS-40 | SACRAMENTO, CA 94273-0001  
(916) 654-4959  
[www.dot.ca.gov](http://www.dot.ca.gov)



June 24, 2024

Veronica Hernandez  
Senior Planner  
City of Riverside, Community and Economic Development, Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522

Electronically Sent: <vhernandez@riversideca.gov>

### Re: SCH #2022100610 – Mission Grove Apartments

Dear Ms. Hernandez:

- 2.1 The California Department of Transportation, Caltrans Aeronautics has reviewed the Draft Environmental Impact Report for the Mission Grove Apartments. One of the goals of the California Department of Transportation, Aeronautics Program, is to assist cities, counties, and Airport Land Use Commissions (ALUC) or their equivalent, to understand and comply with the State Aeronautics Act pursuant to the California Public Utilities Code (PUC), Section 21001 et seq. Caltrans encourages collaboration with our partners in the planning process and thanks you for including the Aeronautics Program in the review of the Draft Environmental Impact Report.
- The proposal is for a total of 347 studio, one-, two-, and three-bedroom residential apartment units within five, 4-story buildings on 9.92 acres. The project will include indoor amenities including a leasing office, clubroom, fitness center, and outdoor amenities including a pool and spa, outdoor seating and dining areas, and a dog park. The project site is located approximately 3.2 miles of the March Air Reserve Base/Inland Port Airport.
- In accordance with CEQA, Public Resources Code Section 21096, the California Airport Land Use Planning Handbook (Handbook) must be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries, or if such a plan has not been adopted, within two miles of an airport. The Handbook is a resource for all public use airports and is available online at: <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-al1y.pdf>
- 2.2 **Safety Compatibility Policies**
- The proposed Project site is in Compatibility Zone C2 (Flight Corridor Zone) and the airport influence area (AIA), of the March Air Reserve Base/Inland Port Airport and therefore must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan (ALUCP) adopted by the ALUC pursuant to the PUC, Section 21674. The City of Riverside should
- “Provide a safe and reliable transportation network that serves all people and respects the environment”

2.2 { consider Compatibility Zone C2 Compatibility polices stipulated in the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.

The Riverside County ALUC deemed this Project inconsistent on September 14, 2023, due to incompatibility with the residential density criteria of the safety zones. The Project's proposed residential density of 35.0 du/ac exceeds the maximum allowable residential density for Zone C2, which is 6.0 du/ac as defined in the ALUCP. County Wide Policy 3.3.1, which allows for greater densities in infill areas, would significantly exceed the densities outlined for the airport safety zones. These actions would be inconsistent with various policies within the ALUCP, which aim to reduce potential hazards from flight accidents and promote general public health and welfare. It should also be noted that the United States Air Force supported the ALUC's recommendation of inconsistency due to concerns regarding the proposed increased density. Caltrans Aeronautics encourages the consideration of a Proposed Project Alternative that allows for residential development in compliance with the ALUCP compatibility policies.

2.3 { **Amending a General Plan / General Plans**

Per the California Public Utilities Code Section 21001 et seq. relating to the State Aeronautics Act, Section 21676(b) prior to the amendment of a general plan...within the planning boundary established by the airport land use commission pursuant to Section 21675, the local agency shall first refer the proposed action to the commission. If the commission determines that the proposed action is inconsistent with the commission's plan, the referring agency shall be notified. Any proposed development in the defined safety zones, therefore, must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan(s) adopted by the ALUC pursuant to the PUC, Section 21674.

2.4 { **Basic Statement of Compatibility Concerns (Hazards to Flight)**

The project also proposes 40,000 square feet of solar panel area on the building's rooftops and carports in Zone C2 of the ALUCP. Compatibility concerns regarding airport obstructions and hazards to flight (such as wildlife attractants, lighting, or glare i.e., solar, etc.) should be considered. Moreover, proposed structures that exceed FAA Regulations Part 77 height criteria are subject to an Obstruction Evaluation/Airspace Analysis for determination.

An ALUCP is crucial in minimizing noise nuisance and safety hazards around airports while promoting the orderly development in the vicinity of airports, as declared by the California Legislature. A responsibility of the ALUC is to assess potential risk to aircraft and persons in airspace and people occupying areas within the vicinity of the airport. The intent to overrule the ALUCP should not be taken lightly, and projects should be compliant with state and federal regulations. PUC Section 21675.1(f) provides: "If a city or county overrules the commission pursuant to subdivision (d) with respect to a publicly owned airport that the city or county does not operate, the operator of the airport is not liable for damages to property or personal injury resulting from the city's or county's decision to proceed with the action, regulation, or permit."

"Provide a safe and reliable transportation network that serves all people and respects the environment"



Veronica Hernandez, Senior Planner

June 24, 2024

Page 3

2.4 { These comments reflect the areas of review by Caltrans Aeronautics with respect to airport related noise, safety, and land use planning issues. Thank you for the opportunity to review and comment. If you have any questions, please contact me by email at [vincent.ray@dot.ca.gov](mailto:vincent.ray@dot.ca.gov).

Sincerely,

*Vincent Ray*

Vincent Ray  
Aviation Planner

c: California State Clearing House; [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

Matthew Friedman, Office Chief Aviation Planning;  
[matthew.friedman@dot.ca.gov](mailto:matthew.friedman@dot.ca.gov)

Ray Desselle, Deputy District Director, Caltrans District 8; [ray.desselle@dot.ca.gov](mailto:ray.desselle@dot.ca.gov)

"Provide a safe and reliable transportation network that serves all people and respects the environment"

**Comment Letter 2 – California Department of Transportation, Division of Transportation Planning, Aeronautics Program**

**Commenter:** Aeronautics Program

**Date:** June 24, 2024

**Response 2.1:**

The commenter details the processes necessary to comply with the State Aeronautics Act. According to the Riverside County Airport Land Use Compatibility Plan (<https://rcaluc.org/new-compatibility-plan>), Chapter 1 Introduction, the policies in the plan are based on state laws and guidelines and master plans for the respective airports. It further states “The policies in this Compatibility Plan, including the individual airport compatibility maps, take into account the guidance provided by the current edition of the Airport Land Use Planning Handbook, dated January 2002.” The March Air Reserve Base/ Inland Port Airport Land Use Compatibility Plan (MARB/IPA ALUCP, 2014) is part (Volume 2) of the Riverside County Airport Land Use Compatibility Plan. As outlined in the DEIR, Section 5.9 Hazards and Hazardous Materials, pp. 5.9-14 - 5.9-24 and the Land Use section pp. 5.11-1 – 5.11-65, the DEIR contained an analysis of the Project’s consistency with the MARB/IPA ALUCP. Therefore, the California Airport Land Use Planning Handbook was utilized as part of the analysis of this Project.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 2.2:**

The commenter expresses concerns regarding the ALUC’s finding of inconsistencies with the dwelling units per acre in the proposed Project.

The City Council of Riverside has the legal discretion to override the ALUC finding of inconsistency. As outlined in the Riverside Municipal Code (RMC) Section 19.650.020, “All decisions of the City Council to approve or deny a permit or action are by a majority vote of those present and voting except that a 2/3 vote of the total membership (five votes minimum) is required to approve an appeal of a decision of the Airport Land Use Commission (ALUC).” The DEIR acknowledges that although the Project would be consistent with all other policies and requirements of the MARB/IPA ALUCP, that it would be inconsistent with the allowable maximum residential density criteria for the Compatibility Zone C2 and due to this inconsistency the project would result in a significant and unavoidable impact, which requires a Statement of Overriding Considerations.

The City did in fact consider a Project alternative that allows for residential development in compliance with the ALUCP compatibility policies, as outlined in the DEIR, Section 7.0 Alternatives to the Proposed Project, pp. 7.0-1 - 7.0-15, Alternative 2: Lower Density ALUC Consistent Multi-Family Residential. Although Alternative 2: Reduced Density Apartment Redevelopment would have reduced impacts related to Hazards and Land Use and Planning, it does not meet the Project’s objectives (DEIR pp. 7.0-29 – 7.0-30).

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 2.3:**

The commenter mentions that the proposed action must first be referred to the commission prior to amending the General Plan. The local agency, the City of Riverside, did first refer the proposed General Plan Amendment (GPA) as part of this Project to the commission and the commission determined the proposed action is inconsistent with the commission's plan as indicated in the Riverside County Airport Land Use Commission Staff Report, Agenda Item 3.2, dated September 14, 2023 (included in Appendix M of this EIR). Accordingly, the City of Riverside notified the commission of the proposed GPA as part of this Project in accordance with the State Aeronautics Act. As determined in the City Council meeting on August 20, 2024, the City Council intends to overrule the ALUCP, and notice was provided to Riverside County ALUC and the California Department of Transportation, Division of Transportation Planning, Aeronautics Program for the required 30-day review and response period prior to the City's decision on the matter.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 2.4:**

The commenter expresses concerns regarding potential hazards of flight with implementation of the Project. The City of Riverside and the applicant acknowledge that pursuant to California Public Utilities Code (CPUC) Section 21675.1(f), "If the city or county overrules the commission pursuant to subdivision (d) with respect to a publicly owned airport that the city or county does not operate, the operator of the airport is not liable for damages to property or personal injury resulting from the city's or county's decision to proceed with the action, regulation, or permit."

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Comment Letter 3 – Agua Caliente Band of Cahuilla Indians**

Comment Letter 3 commences on the next page.

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION



03-013-2022-002

June 20, 2024

[VIA EMAIL TO: [vhernandez@riversideca.gov](mailto:vhemandez@riversideca.gov)]  
City of Riverside  
Ms. Veronica Hernandez  
3900 Main Street, 3rd Floor  
Riverside, California 92522

**Re: Mission Grove Apartments Draft EIR**

Dear Ms. Veronica Hernandez,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Mission Grove Apartments project. We have reviewed the documents and have the following comments:

- 3.1 { \*The Tribe's name is misspelled as "Aqua Caliente" four times in the document (pages 446 and 448 of the PDF). Please correct these to "Agua Caliente".

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 423-3485. You may also email me at [ACBCI-THPO@aguacaliente.net](mailto:ACBCI-THPO@aguacaliente.net).

Cordially,

Xitlaly Madrigal  
Cultural Resources Analyst  
Tribal Historic Preservation Office  
AGUA CALIENTE BAND  
OF CAHUILLA INDIANS

5401 DINAH SHORE DRIVE, PALM SPRINGS, CA 92264  
T 760/699/6800 F 760/699/6924 WWW.AGUACALIENTE-NSN.GOV

### **Comment Letter 3 – Agua Caliente Band of Cahuilla Indians**

**Commenter:** Xitlaly Madrigal, Cultural Resources Analyst

**Date:** June 20<sup>th</sup>, 2024

#### **Response 3.1:**

The commenter identifies typos/miss-spelling of the tribe's name in the DEIR. The DEIR, Section 5.18 Tribal Cultural Resources, pp. 3.18-7 and 3.18-9 is revised as follows:

On October 18<sup>th</sup> 2022, the City of Riverside sent out AB 52 consultation notices to Tribes. The following tribes requested to consult with the City pursuant to AB 52:

- Soboba Band of Luiseno Indians
- Morongo Band of Mission Indians
- Aegua Caliente Band of Cahuilla Indians

On December 6<sup>th</sup> 2022, the City of Riverside sent out SB 18 consultation notices to Tribes. No Tribes requested to consult with the City pursuant to SB 18. The Soboba Band of Luiseno Indians and Aegua Caliente Band of Cahuilla Indians agreed with the City's proposed mitigation measures described below in Section 5.5.7 as mitigation measures **MM CUL-1** through **MM CUL-4**. These mitigation measures are the City's standard mitigation measures, which were previously developed between the City and 9 consulting tribes pursuant to AB 52. Consultation with the Morongo Band of Mission Indians was not concluded at the time of publishing this DEIR and remains open.

The City and the Soboba Band of Luiseno Indians and Aegua Caliente Band of Cahuilla Indians agreed that, in the event of the inadvertent discovery of previously unknown cultural resources of tribal or Native American importance during construction activities, appropriate mitigation measures would be implemented and followed. The Soboba Band of Luiseno Indians and Aegua Caliente Band of Cahuilla Indians accepted the City's standard mitigation measures (**MM CUL-1** through **MM CUL-4**), to ensure that potential impacts in the event of an inadvertent discovery of resources remain at less than a significant level. Therefore, potential Project impacts to tribal cultural resources would be **less than significant with mitigation measures MM CUL-1 through MM CUL-4**. At the time of preparation of this DEIR the Morongo Band of Mission Indians has not agreed with the City's proposed mitigation measures or agreed to closing AB 52 consultation.

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

**Comment Letter 4 – John Farnsworth Comments – Community Member**

Comment Letter 4 commences on the next page.

Delete Archive Report Reply Reply all Forward Zoom

RE: [EXTERNAL] Comments/Questions/Request fo Information DEIR 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:

Enclosed are my comments/questions/request for additional information associated with the subject DEIR.

Why should the City approve a three-sided, 57 feet tall apartment complex that does not fit in with the existing MG General Plan, the only buildings in the MG area four stories tall that will create an eyesore for all who live here and cast concerns about continued community livability/quality of life?

Please advise if additional information is needed for the City to process these comments.

Please confirm receipt of this email.

Thank You
John Farnsworth

On Friday, June 14, 2024 at 02:26:02 PM PDT, Hernandez, Veronica <vhernandez@riversideca.gov> wrote:

Hello, John,

You can submit directly to me using this email address.

Thank you,

Veronica Hernandez | Senior Planner

951.826.3965 | vhernandez@riversideca.gov



RESPONSE TO MG DEIR

Location	COMMENTS/QUESTIONS/REQUEST FOR INFORMATION
DEIR	
1	This DEIR does not accurately reflect the final project. The original developer has withdrawn from the project, and it appears that the property owner has assumed the developer role. Obviously the design and associated approach and requirements will change dramatically. Why is the City proceeding with this EIR knowing what is presented therein will not be processed for approvals? How is the City addressing this very important disconnect that will result in changes to the EIR? Will a corrected EIR be issued for public review of the actual project being proposed, avoiding multiple changes? Will subsequent changes have notations of changes (change bars for example) made from the initial version?
2	Cell phone/WIFI/Internet Carriers: No where in the DEIR is there a discussion of how the cell phone towers may be impacted by the almost 60 foot buildings that are planned. Why was this not considered? Many residents rely on line-of-sight to existing cell phone towers (T-Mobile for example). Can a new study be accomplished to measure this hugely potential problem associated therewith?
3	Does the USPS need to be consulted? What is the plan for individual mail delivery?
4	March JPA recently announced a new development for a Cargo facility, allowing up to 17 additional flights per day. Did this EIR consider that as it relates to traffic patterns, truck traffic (Alessandro and Van Buren in particular, plus increased congestion on the 91 and 215 freeway entrances/exists), noise, pollution, air noise etc.? Will the tenants who decide to rent in this project have to be notified prior to signing an agreement that air traffic exists and may increase in the near future (much like home owners have to disclose when selling their house)?
5	What deviations, waivers, changes has the owner already prepared/submitted to consideration of the project (in addition to those included in the DEIR)?
6	How are such changes processed in the future ( i.e.. Are such changes made public and / or voted upon by the City council)?
7	The current Owner has stated it's intent to sell this property to a developer if/when this EIR is approved. Why proceed with the EIR then, knowing the developer is TBD and not included in this EIR is ALL aspects? Will a change in ownership require an updated EIR and approval by Planning/City of Riverside? How is this EIR being written/administered so that any future developer must comply with ALL aspects of this EIR? This EIR is already bias in that it was written to support the owner, not the residents of Riverside, and Mission Grove in particular. Why should the City approve a three-sided, 57 feet tall apartment complex that does not fit in with the existing MG General Plan, the only buildings in the MG area four stories tall that will create an eyesore for all who live here and cast concerns about continued community livability/quality of life?
8	1.0-1 Will the amenities (including the dog park) be established for public use?
9	1.0-3 Can rewriting the project objectives to less lofty goals would allow for alternative uses be considered and become more viable? Says "replace aging building construction". The existing K-Mart was recently build; how is this considered an aging (built in 1991) building? Says "encouraging walkability". Is this limited to those tenants who eventually reside in the complex? I live nearby and I rarely see anyone walking or bike riding to the existing shopping center. Where is evidence that more people will choose to walk/bike to the existing hopping center?
10	
11	1.0-4 Will changing the objectives allow for other options to be considered? What is the definition (from an EIR perspective) definition?
12	1.0-5 Why were alternative sites not considered (only because the owner did not offer any other locations for consideration)?
13	1.0-6 Can CEQA guidelines #15093 and #15091 be provided to public review to ensure compliance?
14	1.0-8 How was it determined here (and other places that say "less than significant") determined and by who?

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- 15 Threshold E and other places: Identified as significant and unavoidable: Why is this project allowed to be considered when there is no mitigation proposed/offered/request for comments provided? How was it determined to be less than significant to residential impact when it already declared unavoidable and significant?
- 16 1.0-21 Threshold A: no impact. The local community disagrees with this declaration. Adding a four story, highly dense apartment building (up to 60 feet high) to this residential community most certainly divide/disrupt/not fit in with the established community. How is this being addressed to include community involvement in the design aspects (something more than issuing this DEIR)?
- 17 1.0-24 Threshold A: Less than significant: It appears to me that this would apply only if the existing land use is waived. Adding 800-1000 people in such a small locations would obviously increase the unplanned growth for this area would obviously increase, would it not (no existing population at the present)?
- 18 1.0-26 Threshold A: Significant and unavoidable: Why is this project even being considered when there is no mitigation proposed/offered/request for comments provided? How was it determined to be less than significant to residual impact when it already declared unavoidable and significant?
- 19 1.0-27 Refer to questions/concerns that follow for available water supply.
- 20 1.0-29 Can CEQA guidelines #15121 be provided to public review to ensure compliance?
- 21 2.0-1 Significant and unavoidable: Why is this project even being considered when there is no mitigation proposed/offered/request for comments provided? How was it determined to be less than significant to residual impact when it already declared unavoidable and significant?
- 22 2.0-3 How is this project addressing "growth inducing impacts" and describe "measures to reduce or lessen potential impacts and impacts after implementation of impacts?"
- 23 2.0-7 How has the lead agency complied with statements #7 Findings and #8 Mitigation?
- 24 2.0-9 Is there a reason that the existing apartments adjacent to and close nearby were not included in the project location definition (perhaps to avoid discussing existing apartments?)
- 25 3.0-1 Is there a reason that the existing apartments adjacent to and close nearby were not included in the project location definition (perhaps to avoid discussing existing apartments?)
- 26 3.0-6 What is TPM 38598 and why was this not part of the DEIR?
- 27 3.0-14 Why is "averaging" allowed in minimum landscape setbacks (will this require a waiver / deviation to existing building codes?)?
- 28 3.0-16 Has the required 604 parking spaces 15% reduction already been approved by the City? Why? The code was written for a reason, was it not? What is the definition of "tandem parking spaces"? Are these side by side or front to back? What is the plan for parking should tenants NOT agree to paying for a parking space (i.e. overflow parking to commercial parking spaces already part of the adjoining businesses? Have the businesses been informed of the potential for more crowded parking lots?
- 29 3.0-17 Is the City or WMWD paying for the utility improvements identified herein?
- 30 3.0-23 Again, what is the definition of "aging": building construction?+B49
- 31 4.0-1 Is there a reason that the existing apartments adjacent to and close nearby were not included in the project location definition (perhaps to avoid discussing existing apartments?)
- 32 5.0-1 Can CEQA #15382 be provided for public review to ensure compliance?
- 5.0-2 Can Appendix G and H be provided for public review to ensure compliance?

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- 33 { 5.1-2 Visual Character: Did the City and owner consider that this project will create a new, up to 60 feet high, visual building unlike any other in the nearby area of primarily residential and apartment dwellers? How was it determined that the visibility of the project on Alessandro "partial"? What is the definition of partial?
- 34 { 5.1-8 Will the dog park be for public use also? What is the definition of "enhance the aesthetics"? Creating visible exterior walls doesn't sound pleasing. Threshold C: "degrade existing public views of the site and its surrounding areas. How could a 57 foot series of buildings in a small plot not degrade the existing local views of residents/passerbys? There are NO other building/structures nearby that come close to what is being proposed. Downtown Riverside qualifies as does UCR, and except for hotels nearby, no other building of this height apply, right? So why start a new trend?
- 35 { 5.1-21
- 36 { 5.1-23 How was it determined that the project "would not result in a substantial adverse impact", when the addition of a 57 foot series of building will be built?
- 37 { 5.1-24 Same question as 5.1-23.
- 38 { 5.3-14 EV charging station for new construction: Has the project strictly complied with these requirements? Will these charging unity be available for public use? Will the charging stations be made available at reduced rates with grants etc. from other sources? How will TESLA type vehicles (different requirements) be handled?
- 39 { 5.3-15 Where are recycling and collection locations identified? Will the locations be easily assessable by the waste management companies? This project will add many new vehicles to the local area that will obviously increase "air pollution included in General Plan 2025". How is this being addressed (vehicle miles data does not support the increased number of permanent number of new vehicles to be parked/stored in a small area)?
- 40 { 5.3-17 Solar power: How is the solar power being proposed being accounted for (used)? Will individual tenants be using Solar generated power? Will the tenant billing reflect solar power generated? Is the solar power generated for use only by the management of the facility? Do the proposed solar power panels comply with California new apartment building requirements (including individual tenants)? Does the solar power plan comply with the City of Riverside "green power projects"?
- 41 { 5.6-16
- 42 { 5.8-24 Does this project comply with CCR, Title 24 Part 11? Will any/all EV stations have public access? What about Tesla models?
- 43 { 5.8-29 Does this project comply with and exceed the measures identified?
- 44 { 5.9-37 T-5: Why does this not apply? What will the City be doing to improve traffic flow in the area of this project?
- 45 { T-6: Why is this consistent? No new jobs will be created, except for project ownership activities. During peak times for traditional work start/end times, will traffic increase in the local area? How is this being addressed?
- 46 { 5.8-39 How will water usage be reduced (over time) by 20% to satisfy this requirement?
- 47 { 5.8-36 Why is the City agreeing to a 15% parking reduction request? Will this require a waiver/deviation? As such, does this qualify for unique City Council vote to approve?
- 48 { 5.9-6 Where is the evidence that vehicle miles will be reduced by changing the designation to Multi-used Development?
- 49 { 5.9-8 Where is the evidence that shows compliance with March Air Reserve Base/Inland Port Airport Land use Compatibility plan?
- 50 { 5.9-8 What is the City doing to ensure Policy LU-22.5 (and others) is applicable (feasible)?
- 50 { 5.9-14 MARB/IPA Analysis and Findings: Why is the City even considering such a project when the project "Exceeds the maximum allowable residential Density"?

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- 51 For determining total occupancy density (parking spaces provided), is this calculation before or after the 15% reduction in the requirement addressed earlier?
- 52 5.9-17 What "improvements will improve delay" are proposed by the Owner and the City? Where is the data/analysis that summarizes peak hour delay from "197.3 to 152.9 seconds"?+B80
- 53 The total elevation is very close to the PAR 77 requirement. Should FAAOES be reviewed anyway?
- 54 5.9-22 Has the City Council/Public/Mayor been informed that a 2/3 majority is required to override the Riverside County ALUC decision? What are the pro/cons of presenting this to the City Council for a vote?
- 55 5.9-27 Airport Land Use Compatibility: How was it determined by the Owner and the City (independently) to be "less than significant"? Does that mean the ALUC is not a serious requirement that must be thoroughly address/discussed and voted upon?
- 56 5.9-28 The MARB/IPA LUCP for March ARB is not downloadable without Adobe proprietary software. Can this file be provided to the public for review to ensure consistency with statement contained in the DEIR?
- 57 5.10-7 When will the Green Action Plan update be provided for public review? Again, how will this project satisfy the 20% reduction goals over time (10-20 years from now)?
- 58 5.11-1 The Mills Water Filtration Plant is NOT operated by WMWD, rather MWD, correct?
- 59 5.11-2 How is this project addressing "potential noise impacts and inadvertent flight related emergencies", especially with the planned height of almost 60 feet (the tallest type buildings in the area)?
- 60 5.11-7 How was community collaboration included in development/design/type of project decisions?
- 61 5.11-8 How was RMC Title 19 (1-10) satisfied in the layout and design of this project?
- 62 5.11-9 What exactly does "integration of uses...pedestrian connectivity, walkability and shared uses mean? Is this solely related to new tenants in the project? When viewed as a "destination" for pedestrians and bike riders, there is currently very little of such activities, so there really is no benefit to the neighborhood.
- 63 5.11-10 Why does this section totally ignore/not address the existing housing type of make up of the primarily single home residences? Same question as 5.11-9 above.
- 64 5.11-12 What new job centers are included in this project? Same question as 5.11-9 above.
- 65 5.11-13 Policy AQ-1.7: Same question as 5.11-9 above.
- 66 Policy AQ-1.12: How does this project "promote community self sufficiency and discourage automobile dependency, while removing public access driveways (increased traffic into other entries to the existing shopping center)? As discussed earlier, walk paths/bicycle lockers while touted are of almost zero benefit to the community.
- 67 Policy AQ2-4: Analysis says VMT MAY reduce VMT by 17.7%; where is the analysis to support this declaration. Impact to traffic continues to be MORE THAN SIGNIFICANT. How is the city/owner including in their planning ways to reduce VMT numbers and reflect the community concerns about obvious increase in overall traffic driving down Alessandro Blvd, timing of lights that would create more bottlenecks, and longer transit time (car idling waiting for lights to change) to local residents?
- 68 5.11-15 Why should the public be forced to accept a project that "would not be consistent with the current General Plan land use designation"?

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- 69 5.11-16 Why (again) should the public agree to a "project design consideration" to comply with EV charging stations? And why should the city agree (there are no EV charging stations currently installed in or around the project location)?
- 70 5.11-18 What "improvements will improve delay" are proposed by the Owner and the City? Where is the data/analysis that summarizes peak hour delay from "197.3 to 152.9 seconds"?+B80
- 71 What is the fair share of "3.22%" based upon? Where is the data/calculation(s)? How much money will the City receive for this? Will the MG residents have any say/financial consideration how these funds will be spent by the City? Can the City identify what improvements will be made for the MG community, since it's the local residents who will bear the pain of highly increased traffic/queues? How was the "Consistent" level determined, when it is stated that the Project will add to existing traffic problems? Has the City agreed that "no feasible improvements are feasible to offset operational deficiencies"? There could be many choices that could be made if the City would consider other (perhaps more costly) alternatives (traffic enforcement to reduce unauthorized truck use of Trautwein for example). Can the City change it's speed limit policy, form single lane usage etc. to reduce traffic backup?
- 72 5.11-19 Has the City considered time of use restrictions for trucks and autos?
- 73 5.11-20 Why are existing driveways/sidewalks being gated for resident use only? Will this result in increased use/congestion at the other entrances to the shopping center?
- 74 5.11-21 Walkways/bicycle paths "throughout". How does this statement conflict with existing driveways being removed above (does this mean the existing sidewalks will not allow pedestrians/cyclists to continue using them)?+B99
- 75 What "improvements will improve delay" are proposed by the Owner and the City? Where is the data/analysis that summarizes peak hour delay from "197.3 to 152.9 seconds"? What is the VMT reduction when existing driveways and sidewalks will be limited to tenant use only? Where is the data that supports "reducing local vehicle trips and associated VMT"?
- 76 5.11-22 How/why/what will the vehicular gates be that are planned for installation? In this MG area, only HOA communities have such restrictive gates. Does this make the project look more like a jail/prison encampment with vehicular gates? What is wrong with "no public access"? There is plan for "shared parking" spaces, is there not?
- 77 5.11-23 What RTA information is available that identifies ridership and the need to relocate the existing bus stop?
- 78 5.11-24 Might the overall height of the buildings create a problem for private plane flights and helicopter (police) flights that use this airspace?
- 79 5.22-25 What is the definition of "non-residential" and how does it apply here?
- 80 Even though 604 parking spaces are identified, will parking by unauthorized vehicles be disallowed by adding red curb areas along the streets located in the area around this project? Has the shopping center agreed that 91 spaces might be used by tenants? What about tenant visitors and perhaps greater number of tenant cars might overflow even further? Has the shopping center tenants been made aware that their parking lot could be over used by this Project?
- 81 5.11-26 Has the project considered other type of transportation (electric bikes, skateboards etc.)?
- 82 5.11-27 What is the definition of "high quality residential development"? When this project is completed, will the owner sell the resulting project to a different company? If ownership is changed, does that change in ownership require City approval? How does the City ensure that promises, contractual requirements, building requirements are honored etc.? Is the owner required to keep this project as a tenant "rental" property? Will sublets be permitted?

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- 86 Policy N\_EJ Discussion address "construction" noise, but not noise reduction and control measures "to residential neighborhoods". How will the project ensure compliance with noise levels to residential neighborhoods (tenant noise, use of landscape appliances that are gas driven, etc.). Can time of use requirements to landscape maintenance for example by I implemented by the City?
- 87 5.11-30 What is the overall plan for "rental and ownership"? Does this mean units will be offered upon completion for sale? How many and which units? What is the definition of "community and infrastructure connections"? What the definitions of "special characteristics? Can examples be provided?
- 88 5.11-31 How is "multi family residential neighborhood" different from single-family residential community?
- 89 5.11-32 Why was "gym" included as development when in fact the gym has not yet been opened?
- 90 What "business and residential communities" were contacted? Can a list be provided with points of contact? The "community meetings" were accomplished with the initial project developer, were they not? Will the new developer (whoever that may be) conduct new community meetings to that local public inputs can be voiced and acted upon? What is the benefit of talking to the Chamber of Commerce and East Hills business council, when NO new commercial opportunities will be made available to this tenant (rental) facility?
- 91 5.11-33 Since this will be a "closed tenant facility" how will the touted (here again and many places), why is this not a "strip development"?
- Riverside County Airport Land Use (ACLU) reported that this project is inconsistent with MARB/IPA ALUCP due to higher than allowed residential usage intensity, and that the City will consider said findings "when considering the Project for approval". Is there any reason that this inconsistent finding cannot be discussed/reviewed by the public/any other approval agencies NOW rather than waiting for the City to engage when "considering the Project for approval?
- 92 5.11-35 Is there any reason that this inconsistent finding cannot be discussed/reviewed by the public/any other approval agencies NOW rather than waiting for the City to engage when "considering the Project for approval?
- 5.11-36 Is there any reason that this inconsistent finding cannot be discussed/reviewed by the public/any other approval agencies NOW rather than waiting for the City to engage when "considering the Project for approval?
- 5.11-37 "Do not permit further amendments to the Mission Grove specific Plan"...(Policy LU69.1) Is this Project in direct violations of said policy? Obviously this project will increase permitted density, so why is this project even being considered?
- 93 5.11-38 This area is warm/hot during the summer, and people logically will have the ability to open and close doors and windows. How will the interior noise level be contained with "windows and doors closed" to satisfy noise levels?
- 94 5.11-39 Can the "Project-specific noise study" be reviewed for public review/compliance?
- 95 5.11-40 Says "without impairing public access"...Will morning/evening departure/arrival of tenant cars comply with "effectively integrated"?
- 96 5.11-42
- 97 5.11-43 How does the project "preservation of open spaces" and "protect native plants in the area? Are there open spaces unknown to the local community?
- 98 Solar systems: as discussed earlier does this Solar system support only the project facility energy usage or do individual tenants also benefit from the Solar system being proposed? Is this in accordance with building codes for new apartment construction?
- 99 5.11-44 Can the public be provided a copy of the will serve letter from WMWD (and other utility providers)?
- 5.11-46

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- 100-5.11-47 Metropolitan 2020 UMWP is four years old. Since this EIR may result in a facility that will exist for many generations, would it be more prudent to request/ask for a more current report be generated for public review? The last three years have been hottest in recorded history, and looking ahead for only 25 years is illogical, knowing water sources will continue dwindling. The public has been asked to reduce water 20%, how will this new development satisfy this request?
- 101-5.11-48 Who determined that the Project "would not need to fund fair share costs" associated with 346 new apartments dwellings?
- 101-5.11-49 Who determined that the Project "would not need to fund fair share costs" associated with 346 new apartments dwellings?
- 102-5.11-51 Telecommunication services: Was a study conducted to ensure that WI FI and cell phone coverage will not be affected by the almost 60 feet tall buildings? Line of sight is needed, for example, to residents who use T Mobile internet service.
- 103-5.11-62 Adding the additional 1,000 or so new residents, will the Police need to hire/reassign officers to the MG area due to the increased local population?
- 104-5.11-53 Why is the city agreeing to reverse Policy LU-69.1. What is the benefit to the MG neighborhood?
- 104-5.11-54/55 Why should the City and local residents want/agree to such changes? Will these potential approvals constitute sound practices to maintain current policies, rules/ provisions are already in place, monitored my multiple agencies. This project will require many changes, variation, waivers etc. What is the benefit to the MG neighborhood?
- 105-5.11-56/57 Why should the City and local residents want/agree to such changes? Will these potential approvals constitute sound practices to maintain current policies, rules/ provisions are already in place, monitored my multiple agencies. This project will require many changes, variation, waivers etc. What is the benefit to the MG neighborhood?
- 106-5.11-57 What is the "nearest runway" referring to? Building height is nearly at the point that requires review. Should a review be conducted anyway, since the margin is quite low?
- 107-5.11-58 Why should the City and local residents want/agree to such changes? Will these potential approvals constitute sound practices to maintain current policies, rules/ provisions are already in place, monitored my multiple agencies. This project will require many changes, variation, waivers etc. What is the benefit to the MG neighborhood?
- 107-thru 5.11-60
- 108-5.11-60 What is the definition of "occupants of the property"? Building tenants, the property owner or?
- 109-5.11-64 Why should the City and local residents want/agree to such changes? Will these potential approvals constitute sound practices to maintain current policies, rules/ provisions are already in place, monitored my multiple agencies. This project will require many changes, variation, waivers etc. What is the benefit to the MG neighborhood?
- 110-5.13-10 How is Objective N-4 being accomplished? I do not find any such are minimized by the identified suggestions. Are there others? Table identifies "Normally acceptable and Conditionally Unacceptable", while the definitions are for "Normally acceptable and Conditionally acceptable". Is this an error? Where is the definition for Normally Unacceptable and Conditionally unacceptable? Will the correct terms, when defined, still show the results shown? What "noise insulation features" and "what features are being employed to bring the noise to an acceptable level"? What will the results reveal for when the increased driving time for work start/return be? " Can this be accurately forecast?
- 111-5.13-12/13
- 112-5.13-15/16 What "noise insulation features" and "what features are being employed to bring the noise to an acceptable level"?
- 113-5.13-18/19 Acceptable increase in noise level. Has these statements been confirmed by a licensed, certified, consultant to confirm these predictions?

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- 114- Is this describing individual A/C, heating ventilation for individual dwellings (that is, will each unit have its own equipment or will whose units be shared?)? If not individual units, how will tenants be able to customize the output to their personal satisfaction?
- 115- Are double pane windows a requirement for "Green Construction Goals, both individual units and the overall facility? If not, why? Again, measurements are made with doors and windows closed; what if tenant chooses to open windows and doors for personal preference?
- 116- 5.13-21 "Long Term Ground Borne Noise" is not addressed in the narrative. Why not? And if so, what narrative should be added?
- 117- 5.13-24 "What other planned and pending development" are there? Will less than significant still apply when the questions/comments here are corrected/addressed?
- 118- 5.13-26 What job center and institutional is resulting from this project?
- 119- 5.14-3 What is being done to discourage automobile dependency (for workers that cannot walk, bike or RTA to work? And "reduced vehicle trips"?
- 120- 5.14-4 Topic discussed the project will increase City population by 1.4%. How is this going to affect the population growth for the MG planned community?
- 121- 5.15-2 How is the project impacting pre-school, elementary, middle and high school enrollment? What transportation methods are being made available to children to attend school (noting that delivery to/from school will increase vehicle traffic; should traffic patterns include these type of trips also?)?
- 122- 5.15-5 What is planned access to top floor dwellings, for example, to permit emergency ingress/egress? Are elevators/escalators/lifts included in the design? Did the RFD / ambulance services/RPD and County services agree that the "Project will UNLIKELY contribute to the need for additional services, staff or equipment (high lift ladders for example to reach the top floors)? The narrative talks about the City in general, but what about MG planned specific needs? Will the master MG Plan need to be modified as well?
- 123- 5.15-7 Taxes are paid by all residents, including new Project. These go into general funds. Will the increased property taxes by identified for MG area?
- 124- 5.15-8 What fees will be paid to the developer? And paid to whom (public record?)?
- 125- 5.15-9 How is the project contributing to objectives identified in 5.16.2.3 (especially "open space" in this high density design)?
- 126- 5.16-2 How will environmental Impact change if the estimated population is greater than 829 persons? Should a contingency estimate be prepared? The narrative discusses Riverside in general' why not properly address MG location?
- 127- 5.16-4 What will be the amount of "Impact and Park Development" fees paid to the city (public record)? These fees could change to "less than significant impact" to a higher impact, could it not?
- 128- 5.16-5 Explain why a 15% below VMT was used. Increased traffic will result from this Project. Throughout the DEIR, little discussion is adequacy addressed; rather is exists already and therefore the traffic increase is unavoidable. What concepts has the City/Owner developed to offset this enormous concern for residents? Can the local law be changed to better monitor/ticket violators that speed on Alessandro, and allow trucks to illegally use this road to reach its destination? Can enforcement be increased to accomplish fewer trucks and lower speeds? How about lower size/weight restrictions be placed on trucks (perhaps using the money given to the City for traffic increases)? Can the City study these areas of concern, using the money received from the Project, to B145develop new/better ways to mitigate the increase traffic that will result from this project (calming to use City description).
- 129- 5.17-5/6/7 Lots of "could, may and should" comments. Are there studies (from Amazon for example) that support these what if's?

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- 130 { 5.17-9 The narrative makes a lot about the previous K-Mart traffic patters. How is this study more correctly calculating peak times traffic patterns (work out/return, trips to schools by parents delivering students, etc.)? What evidence is there that "internal trips and localized trips would not impact the VMT"? As a resident I witness very few walkers, bicycle, RTA users using existing walk ways and bike paths. How is adding walk ways and bike paths (do any exist specifically designed now?) assist in reducing vehicle traffic? Furthermore, the facility has been vacant for 4 years. Were the calculations accomplished to note that no traffic entered the Project area during this time? Furthermore, it should be noted that several businesses have left the shopping center due to low traffic/loss in revenue.
- 131 { 5.17-10 Can the City provide the queuing analysis identified herein? As drivers continue down Alessandro both directions, is it correct that traffic patterns will also increase at other lighted intersection, and at the entry and off ramps will also be impacted? Was the study (ies) developed to consider these other queuing times and vehicle traffic? If not, why?
- 132 { Improvement were identified: What other improvements could be implemented if sufficient amount of funds be authorized (using Developer fees for example)? As discussed earlier, what study/comparison/analysis has been completed to be able to agree to the statements "resident paths of usage"?
- 133 { 5.17-11 Also, residents residing south of the Project, would be required to walk around the perimeter of the project due to closed access, would they not?
- 134 { 5.17-13 "Improvements Include": what are the other improvements not included?  
Referenced reports date back to 2018 and 2020. Are more recent reports available and should newer reports be completed?
- 135 { 5.17-15 Again, a lot is made of adding walk ways and bike paths. Why is on .14% applicable to reduced VMT, since the project touts such usage so prominently? "...above jurisdictional requirements" What is the plan to accomplish SDT-2? Which of the suggested approaches will be implemented? The project does not propose implementing a car share program." Is this in compliance with laws/regulations/guidance from government agencies for new construction (shared car pooling spaces for example)?
- 136 { 5.17-16 Will the project enable high speed internet usage for work at home employees? Did the Project research "latest literature" for implementing a program for VMT reduction?
- 137 { 5.17-17 Why is 11.9% VMT calculation pertinent? Description says EV usage "might not reduce VMT", rather GHG. Which is correct and how does EV reduce VMT by 11.9% and charging for second parking spaces another 3.9%? Has the Property Owner declared that there will be a leasing office/management to accomplish described TRT-4?
- 138 { 5.17-17/18 VMT will not change under the Project planning (significant and unavoidable impacts). Is it possible for this issue to be specifically voted on by City Council (apart from the project) and or can a City ordinance be put on the ballot for the public to be made aware and approve? If not, why? Would a public generated referendum qualify for a ballot initiative?
- 139 { 5.17-22 Emergency access: How will the RFD reach the top floors if needed to evacuate someone from the building? Are lifts being proposed? Are mitigation measures potential if sufficient funds were made available and City traffic enforcement measures better implemented?
- 140 { 5.17-23 Why should the City, on behalf of it's residents, agree to Environmental Effects that WILL result in significant and unavoidable characteristics? As of 14 June 2014, the West Campus Upper Plateau Project was placed on hold by the Commission, which could result in no/minimal VMT impact, leaving the MG project higher by itself (no longer part of the average calculations). Will this result in a correction to the VMT?

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- 141-5.17-25 Unable to access/save/download for public use TIA guidelines, TOA and VMT analysis reports; can printed copies be made available for public review/verification?
- 142-5.19-3 Telecommunication does not address Cell Phone, internet, text messaging of the public WI FI signals from the use of local towers; is there a reason why? Public use is not always satellite and ground cabling, such as T Mobile. Has a study been conducted to measure if there will be loss/reduction of signal for those telecommunication services that rely on "line-of-sight" access to existing cell towers? How will individual dwellings be serviced for these type of services (wherein window access is desired for adequate signal), cable TV (using antennas), and so on?
- 143-5.19-4 This report does not note that WMWD supply from MWD will increase significantly in the coming years (up to projected 76% in the coming years); how will this factor reflect us obtaining potable water in the near future? The various reports from WMWD do NOT reflect the increases incurred in air temperatures being the historically highest for the past 3 years and projected to continue increasing. With reduced available water supply from WMD, due to increased drought forecasts, etc., is relying solely on WMD to increase it's water supply a prudential decision in the coming years? Will a new, updated usage/supply report be accomplished before continuing with the DEIR? How will the project accomplish goals to reduce water usage by 20% year over year?
- 144-5.18-9 Has the project complied with Senate Bill 7 in designing the Project? Although the project is not required to prepare reports to support WMWD and Senate Bills 610 and 221, should such a WSA report be prepared to ensure compliance with the intended purpose of these requirements?
- 145-5.19-11 How/why not is the project complying with "fair share" costs identified for example with Policy PF-1.2 and PF-3.2? The City of Riverside 2007 Plan is hold; it there a requirement to update this plan based upon this Project and future needs?
- 146-5.19-12 This report does not note that WMWD supply from MWD will increase significantly in the coming years (up to projected 76% in the coming years); how will this factor reflect us obtaining potable water in the near future? The various reports from WMWD do NOT factor this in.
- 147-5.19-13 What is RPU 2018? Does this report reflect current/future water supplies, especially recognizing that California has recorded the historically hottest years on record? Should a restriction on new meters be implemented by the City in consideration that water usage will continue to increase amid reduced water supplies (i.e. reviewing the WMWD future water supply resource, it shows that the City will NOT continue to supply WMWD with ECESSS water)?
- 148-5.19-15 Who pays for extensions from existing water lines?
- 149-5.19-16 Telecommunications: Discusses only existing lines from the City ROW; what about other types of telecommunication? WI FI, cell phone, internet usage etc. that may require line of sight capability?
- 150- Can project specific WSA be requested anyway, to ensure all operations will perform for the needed pu+B165rposes?
- 151-5.19-17 This report does not note that WMWD supply from MWD will increase significantly in the coming years (up to projected 76% in the coming years); how will this factor reflect us obtaining potable water in the near future? The various reports from WMWD do NOT forecast this known information. The WMWD Water Service Reliability Report shows increased demand year over year; has this report correctly identified that non-WMD sources will NOT increase their anticipated water increases in the coming years (that is, their supply remains constant, no year-over-year increases)?
- 152-5.19-18 None of data show changes from first year to fifth year; should these numbers reflect reality (probability that no changes occur is quite remote)?
- 5.19-19 "Multi-family residential use accounts for only 3% of water supplied to the area". What is the definition of multi-family resident (does this include both indoor and outdoor residential use)?

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- 153 5.19-21 The WMWD Management plan is still a draft since 2020; when will the plan be finalized? Is there a difference between the "public use" version identified, or is there a final WMWD plan (not marked public use)?
- 154 6.0-2 Can a copy of the ALUC report dated 14 September 2023 be provided for public review in paper and digital format?
- 155 6.0-3 Will the potential City Council vote be held in a public forum as a stand alone vote, with Planning comments/recommendations being made available to the public before being voted upon?
- 156 How is the project reflect "changes and impacts that commit future generations to new environmental circumstances."? Is this solely because changing the land permit usage to the requested project plans will then answer these questions?
- 157 6.0-5 Adjacent commercial area to the east of the Project is a pre-school establishment. Why was this establish not identified as a "sensitive" area of concern? What aspects of the Project are impacted by including this as a sensitive area of concern?
- 158 6.0-9 What will be the "applicant's payment of impact fees for schools, fire and transportation? Will these funds be identified for use by the MG community, as they are the public being impacted/affected/drowned under increased traffic conditions resulting from this project if approved? What is the City/State definition of Mixed Use-Urban for a multi-family development? The City general plan for Mission Grove was established/approved previously correct?
- 159 Population growth is identified for the entire city. What is the projected population growth for the MG area (again, those local residents living in MG impacted/affected/drowned under increased traffic conditions)?
- 160 6.0-1 Economic growth: are there any regulations that require developers to develop economic growth opportunities, reduced travel time, employment opportunities in addition to on-site personnel that will likely have to commute to the Project site (adding to vehicle miles traveled calculations)?
- 161 As discussed earlier, rewriting the project objectives to be less lofty would permit other alternatives to be considered. Were possible used of the vacant facility consider for city services (Police, Human Resources, Veteran usage, homeless facilities etc.), as were other commercial properties like the RPO on Magnolia, City/County Resources off Van Buren, and other locations within the City? The city has approved apartment locations that are NOT 4 story (almost 60 feet). Has there been any consideration to include commercial ventures within the Project (lower floor for example), and/or reducing the number of units permitted such a high building (tallest in the MG area, making it an eyesore)? Alternative choices could eliminate the need to excavate the site, cost a lot to refurbish and would better serve the public interest/use. The existing K-Mart building is not "aging" as stated, unless there is another definition of aging?
- 162 7.0-1 How has the project sought "public participation" early-on? The owner/developer has not that I'm aware conducted any public discussions/meetings or the like before preparing this DEIR after the initial developer dropped out for unknown reasons. Can this be considered "it's a done deal" as at least one of our Riverside Council Members has publicly stated already several times? What were the factors that the City considered when generating/looking for alternative selections Was this a public access meeting or without public/resident input?
- 163 7.0-2 What attempts have been made by the Owner to re-use the facility (public announcements, realtor agents, etc.)? Why did the Owner/City not consider other potential uses for the existing building? Why not consider a veteran facility, student housing, homeless facilities, drug use facilities, low income housing, battered women's facility, U-hall facility? Has the City/owner researched how/what other K-Mart closed facilities been converted to (public research reveals that a small percent of nationwide closed K-Mart facilities being covered to high rise, high density apartments requiring land use variations and waivers)?
- 164 7.0-3

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- 165 { 7.0-9 Under alternate 2, would the building height and number of units be reduced (if yes, so state)? Later, it states that 58 dwelling units might be available (far less than 346, what is the number of stories?).
- 166 { 7.0-15 Should the owner be given more time to solicit new tenants onto the property (and other potential uses described earlier)?
- 167 { 7.0-22 What is the reason off-site locations were not considered (and who made this decision)? There are many other locations that could be used for this project. Because the Project is "focused" on "infill of abandoned or underutilized space", that is not a requirement for any new other project description that has been introduced by the City. Can the objectives be re-written to be less "infill of abandoned or underutilized space" that would then allow for re-consideration of other, less public resistant sediment.
- 168 { 7.0-27 Even though three other sites were rejected because of different ownership and pursuing (not yet approved) projects, that should not mean other locations cannot be considered, can it? Again, updating the Project objectives (as described above) would permit further alternative choices. Where is the evidence / supporting documentation identifying all alternatives are not viable?
- 169 { 7.0-28 How hard can it be to determine if unknown if such a property of similar size exists in the city and is currently available for purchase"? Does the City also own other property locations that could be developed (there have been several apartment complexes developed on City property or acquired over the past several years)? Should this excuse be reconsidered if a proper/thorough analysis is conducted to satisfy this CEQA requirement? Is this project being proposed solely for the benefit of the owner of this property? Should the public, and local MG residents be subject to the needs/wants of an owner solely for financial gain? Is this a "self serving" project by the owner to re-purpose the idle property? Much more discussion/exchange of dialogue needs to be occur before continuing with this proposed project. City Planning and City representatives need to seek public comments before agreeing to pursue this project in any and all manners.
- 170 { P.35 Noise Report "Since detailed architectural plans showing the exterior wall assembly and windows are not currently available": when will such architectural plans be available for public review? Will windows overlook existing residential homes invading privacy laws and regulations?
- 171 { P. 6-1 Traffic Report Understand that the existing bus terminal will be located, however what is the benefit to the City/community? How many riders currently ride the bus and get on/off at this location? How much is bus usage anticipated to increase due to the building of these apartments? Have the existing apartments been polled to determine bus usage for these properties (include bike/walking of apartment residents currently going to/from the shopping center)?

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complexes adjacent to

RESPONSE TO MG DEIR

## **Letter 4 – John Farnsworth Comments – Community Member**

**Commenter:** John Farnsworth

**Date:** June 21<sup>st</sup>, 2024

### **Response 4.1:**

The commenter argues that the DEIR does not accurately reflect the Project due to a change in owners. DEIR Section 3.0 Project Description (pp. 3.0-1 - 3.0-24) accurately reflects the proposed Project as currently designed. The transition of the Project applicant from Anton Development to the current property owner, Regional Properties, Inc., has not resulted in any changes to the project plans. The Project description, objectives, design elements, and intended outcomes evaluated in the DEIR remain unchanged.

Regional Properties, Inc. has assumed the role of the applicant to ensure the continued processing of the proposed Project and its entitlements through the City's established procedures. This continuity ensures that the DEIR's analysis remains valid and relevant, as the scope and nature of the Project have not been altered by the change in the applicant.

The DEIR's analysis covers all necessary aspects of the Project, including environmental impacts and mitigation measures, based on the detailed project description provided. Any future modifications to the Project that could potentially affect the environmental analysis would be subject to further review under CEQA Guidelines Section 15162, ensuring continued compliance with CEQA requirements.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

### **Response 4.2:**

The commenter expresses concerns regarding the Project's impacts to cell phone and Wi-Fi connections. The DEIR focuses on analyzing the significant environmental impacts as required by CEQA. While the DEIR does not specifically address the potential impact of the proposed 57.2-foot buildings on cell phone towers and line of sight issues for residents, it evaluates broader infrastructure and service impacts in DEIR Section 5.10 Utilities and Service Systems (pp. 5.19-1 - 5.19-21). The analysis considers the overall functionality of public services and utilities, including telecommunications infrastructure.

The proposed Project is not anticipated to interfere with access to or usage of the aforementioned types of communication as it is typical for individuals to access Wi-Fi services and cell phone services from third-party providers who would be independent of the proposed Project. Wi-Fi and internet services are typically provided via satellite or cable to individual units, thus building height would not be a factor that affects them.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.3:**

The commenter's question related to mail delivery services by the United States Postal Service (USPS) is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. The Project proponent is responsible for coordinating with the USPS to ensure adequate mail delivery services for future residents. This coordination typically occurs during the project's final design and planning stages, ensuring that mail delivery is efficiently integrated into the development. The Project plans include provisions for centralized mailboxes and parcel lockers within the leasing office and there is a dedicated parking space for USPS, as identified in the DEIR Project Description Figure 3.0-10 Conceptual Landscape and is standard for multi-family residential developments. The DEIR adequately addresses the necessary coordination with public services, and this aspect of project planning will be handled in accordance with USPS regulations and guidelines.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.4:**

The commenter expresses concerns regarding a new development of a cargo facility by March Joint Powers Authority (JPA) allowing up to 17 additional flights per day. As the proposed Project does not propose or include any flights, it would not have a direct or cumulative effect related to flights at March Air Reserve Base (MARB) or noise pollution from additional flights or changed flight patterns. The additional 17 flights from the cargo facility would not be expected to change the results of the noise analysis for the proposed Project. As outlined in the DEIR, Section 5.9 Hazards and Hazardous Materials (pp. 5.9-22 - 5.9-23) the Project will comply with the Airport Land Use Commission (ALUC) recommended conditions of approval, which include the provision of informational brochures for prospective purchasers and tenants. Specifically, Condition #3 states:

"The 'Notice of Airport in Vicinity' that was provided in the ALUC Staff Report for the Project shall be provided to all prospective purchasers and occupants of the property and be recorded as a deed notice."

This condition ensures that all prospective tenants are informed about the proximity of the Project to the March Air Reserve Base and the potential for increased air traffic. By complying with this condition, the Project ensures transparency and provides necessary information to future tenants about existing and future air traffic, similar to the disclosure requirements for homeowners.

The cumulative project list is developed at the time the technical studies and EIR are initiated and include all known approved and pending projects that are anticipated to be completed by the proposed Project's opening year and are located within Project's study area, including adjacent County of Riverside and Moreno Valley. The cumulative project list evaluated in this EIR is found in Table 4.0-1 (p. 4.0-3). Projects that are included in the cumulative project list are those that due to their location and size are anticipated to affect the proposed Project's study area. As the

proposed cargo facility (Gateway Aviation Center project), is located over 5 miles away, and on the east side of the I-215 freeway, in the southeast part of MARB, it was not expected to affect the Project's study area and therefore was not included in the cumulative project list.

In addition, the traffic analysis prepared for the Project also included a cumulative (2040) conditions analysis which was prepared using the regional travel demand model RIVCOM. This regional travel demand model includes all projects anticipated to be completed by the year 2045, and thereby included the cargo facility along with other cumulative developments in the region. The air quality and noise analyses for the proposed Project are based on the results of the traffic analysis.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.5:**

The commenter expresses concerns on informed consent by residents in regard to nearby air traffic. As outlined in the DEIR, Section 5.9 Hazards and Hazardous Materials (pp 5.9-22 - 5.9-23) the Project will comply with the Airport Land Use Commission (ALUC) recommended conditions of approval, which include the provision of informational brochures for prospective purchasers and tenants. Specifically, Condition #3 states:

"The 'Notice of Airport in Vicinity' that was provided in the ALUC Staff Report for the Project shall be provided to all prospective purchasers and occupants of the property and be recorded as a deed notice."

This condition ensures that all prospective tenants are informed about the proximity of the Project to the March Air Reserve Base and the potential for increased air traffic. By complying with this condition, the Project ensures transparency and provides necessary information to future tenants about existing and future air traffic, similar to the disclosure requirements for homeowners.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.6:**

The commenter expresses concerns regarding deviations and changes to the Project. As outlined in Response 4.1 above, the DEIR Section 3.0 Project Description (pp. 3.0-1 - 3.0-28) accurately reflects the proposed Project. All of the plans have remained unchanged. There have been no deviations, waivers, or changes proposed by the owner to the project description outlined and described in Section 3.0 Project Description of the DEIR. There are no proposed changes to the plans or Project Description of the EIR. The Project also does not include any proposed variances or waivers from any code standards.

Any future changes to the Project will follow a structured process as outlined by the City's planning and development regulations. Any significant modifications to the Project that could alter its



environmental impact would require additional review under the California Environmental Quality Act (CEQA). This process ensures that potential impacts are adequately assessed and mitigated if necessary.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.7:**

The commenter expresses concerns about the Project's change in ownership and potential bias in the preparation of the DEIR. A change in ownership does not change the proposed Project. Only changes to the proposed Project (plans or entitlements) as described in DEIR Section 3.0 Project Description (pp. 3.0-1 - 3.0-28) would warrant re-evaluation pursuant to CEQA and a possible revised EIR and re-circulation to the public for review. Any future developer would be required to implement the proposed Project as described in the DEIR and implement all design considerations and mitigation measures in the EIR, as well as the City's issued conditions of approval, for the Project.

The DEIR was not written in bias to support the owner. In contrast, the EIR reflects the lead agency's independent judgement and analysis, as required pursuant to CEQA (Guidelines Section 15090). It is not up to staff to approve the Project, but for consideration by the elected City Council members that represent the residents of Riverside. A property owner has the right to submit an application for development on their privately owned property, including but not limited to construction of new structures or buildings, alterations to building exteriors or site design, and operation of new and/or different uses. The City is obligated to review and process all submitted entitlement applications pursuant to State law and the Municipal Code.

The commenter also expresses concern with the height of the proposed buildings. DEIR Section 5.1 Aesthetics (pp. 5.1-1 - 5.1-24) includes an analysis of the height of the project as well as massing.

As outlined in DEIR Section 3.0 Project Description (pp. 3.0-1 - 3.0-24), and Section 5.9 Land Use and Planning (pp. 5.11-1 - 5.11-65), the Project has been designed to comply with the relevant planning and zoning regulations of the City of Riverside. The Project's consistency with the General Plan, the Mission Grove Specific Plan and other local plans has been thoroughly evaluated.

The DEIR ensures that any future developer must comply with all aspects of the environmental analysis and mitigation measures included in the EIR. This compliance is enforced through the City's approval processes and conditions of approval, which are legally binding on the developer, regardless of any change in ownership. The City's planning and regulatory framework ensures continuity and adherence to the EIR's stipulations.

The Project's design, including the proposed height and layout, has been assessed for its visual and community impacts in Section 5.1 Aesthetics (pp. 5.1-1 - 5.1-24). The analysis includes

considerations of the Project's fit within the existing Mission Grove Specific Plan and addresses potential visual impacts and community concerns.

The EIR process includes public review and comment periods, ensuring that the residents of Riverside, including those in Mission Grove, have opportunities to voice their concerns and have them addressed. The DEIR process adheres to CEQA's requirements for transparency and public participation, ensuring that all voices are considered.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.8:**

The commenter's comment and/or question related to amenities available for public use is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. The DEIR provides a detailed description of the Project's amenities and their intended use. As outlined in Section 3.0 Project Description (p. 3.0-15), the Project includes several amenities such as a dog park, recreational areas, and landscaped open spaces designed for the use of the residents of the apartment complex.

The dog park and other amenities are intended to enhance the quality of life for residents within the development. These facilities are not specifically designed for public use but are part of the private residential complex's offerings. This is standard for many residential developments where amenities are provided for the convenience and enjoyment of residents.

However, the Project will also contribute to the overall community by improving the local infrastructure and providing landscaped areas that align with the City's aesthetic and recreational goals. The DEIR ensures that the Project's design is consistent with the City's General Plan and the Mission Grove Specific Plan, contributing positively to the community while primarily serving its residents. Additionally, the Project would be required to pay impact fees, including the Trail Development Fee, Local Park Development Fee, Aquatic Facility Fee, and Regional Parks and Reserve Parks Development Fee per the Riverside Municipal Code Chapters (RMC) 16.44, 16.60, and 16.76. As detailed in RMC Chapter 16.44 and 16.76, the trail and regional park fees would be used solely for the acquisition of new parkland or trails. Local park fees could be used by the City to purchase new parkland and for upgrading existing neighborhood and community park facilities. (p. 5.16-5.)

The comment and/or question provided does not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As it does not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does it reflect on the adequacy or content of the DEIR, it is deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detail contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general).

Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.9:**

The commenter asks about Project alternatives. Rewriting the Project's objectives to less ambitious goals would fundamentally alter the scope and purpose of the Project. The current objectives are crafted to ensure that the Project aligns with the City's broader goals for growth, sustainability, and community improvement as detailed in the City's General Plan. These objectives also guide the environmental analysis, ensuring that the Project's impacts are thoroughly evaluated and mitigated.

While alternative uses were considered during the planning process, the selected objectives and proposed Project were determined to be the most beneficial for meeting the community's needs and aligning with the City's development goals. DEIR Section 7.0 Alternatives (pp. 7.0-1 - 7.0-29) discusses various alternatives and the reasons for their selection or rejection, ensuring that the most viable and beneficial option was chosen.

The objective the commenter is referring to is outlined in DEIR Section 3.0 Project Description (p. 3.0-27) as follows:

"In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods."

The existing K-Mart building was built in 1991. As new construction is required to be compliant with the current building code, the Project would be more energy efficient in its construction and operations, and therefore would assist in meeting the City's Climate Action Plan, by replacing older building construction with newer and more green building practices and other more sustainable development methods. To further clarify this objective, DEIR Section 3.0 Project Description (p. 3.0-23) and Section 7.0 Alternatives to the Proposed Project (p. 7.0-1) are revised as follows:

"In furtherance of the City's Climate Action Plan, replace aging older building construction with newer and more green building practices and other sustainable development methods."

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted.

**Response 4.10:**

The commenter expresses concerns that they do not see pedestrians or bicyclists in this area regularly, and questions the focus on encouraging walkability. The commenter's comment related to observations of pedestrians is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. The DEIR addresses the Project's goal of encouraging walkability and enhancing pedestrian connectivity in

Section 3.0 Project Description (pp. 3.0-23 - 3.0-24). The Project includes design features aimed at promoting walkability and bicycle use, such as pedestrian pathways, bicycle lanes, and connections to existing sidewalks and bike routes. These features are intended to create a more pedestrian-friendly environment and encourage alternative modes of transportation.

While the goal of encouraging walkability is primarily focused on residents of the new development, the improvements to pedestrian and bicycle infrastructure will benefit the broader community, including nearby residents and visitors to the area. By enhancing the connectivity and safety of pedestrian and bicycle pathways, the Project aims to make walking and biking more attractive and viable options for everyone in the vicinity.

The evidence supporting the potential increase in walking and biking to the existing shopping center and other nearby destinations is based on urban planning principles and studies that demonstrate how improved infrastructure can lead to increased use of non-motorized transportation. The DEIR includes references to these principles and provides a rationale for the anticipated benefits. For instance, the presence of well-designed pedestrian pathways and bicycle lanes has been shown to encourage more people to choose walking or biking over driving, as detailed in various urban planning studies cited in the DEIR.

Furthermore, the Project aligns with the City's broader goals of promoting sustainable transportation and reducing vehicle miles traveled (VMT), as outlined in the City's General Plan and other planning documents. By improving the pedestrian and bicycle infrastructure, the Project contributes to these goals and enhances the overall walkability of the area.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.11:**

The commenter asked if changing the objectives would allow for other options to be considered and what the definition of an objective is.

The City of Riverside, as the lead agency, has broad discretion to formulate project objectives. The objectives of the Project, as outlined in DEIR Section 3.0 Project Description (pp. 3.0-23 - 3.0-24) are designed to address specific needs and goals identified by both the Project proponent and the City of Riverside. These objectives include providing high-quality residential units, enhancing the local housing supply, and contributing to the overall development goals of the community. The objectives guide the scope and nature of the environmental analysis conducted in the DEIR.

From an Environmental Impact Report (EIR) perspective, project objectives are crucial as they define the purpose and need for the project, shaping the analysis of potential environmental impacts and the consideration of project alternatives. Changing the objectives can potentially lead to different project configurations and, consequently, different environmental impacts and mitigation measures.

Project objectives in an EIR set the framework for the entire environmental analysis. They provide a clear statement of what the project intends to achieve and help in evaluating whether the proposed project and its alternatives can meet these goals. Objectives also help in determining the feasibility of various alternatives and ensuring that the chosen project aligns with broader planning and policy goals. While a lead agency may not provide an artificially narrow definition of a project's objectives, it may structure its EIR alternatives analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal.

DEIR Section 7.0 Alternatives (pp. 7.0-1 - 7.0-29) discusses the range of alternatives considered for the Project. The alternatives analysis is designed to provide a reasonable range of options that could feasibly attain most of the basic project objectives while reducing significant environmental impacts. This section ensures that the EIR evaluates different scenarios and identifies the environmentally superior alternative.

Changing the Project's objectives could indeed allow for other options to be considered. However, the current objectives were properly developed to address identified community needs, align with the Mission Grove Specific Plan, and promote sustainable development. Any modification to the objectives would require a re-evaluation of the Project's purpose and need, potentially leading to a different set of alternatives and a revised environmental analysis.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.12:**

The commenter expresses concerns that other locations were not considered for the Project. The DEIR addresses the consideration of an alternative site, Alternative 4, in Section 7.0 Alternatives (pp. 7.0-22 - 7.0-27). The selection of alternative sites for analysis in an EIR is based on their ability to feasibly attain most of the basic objectives of the Project while avoiding or substantially lessening any significant environmental effects. The DEIR explains that alternative sites were evaluated based on several criteria, including the availability of suitably sized parcels, the feasibility of development, and the alignment with the Project's objectives and the City's planning goals. The analysis concluded that no other sites within the vicinity could provide the same level of benefits and feasibility as the proposed Project site. The DEIR specifically addresses the reasoning behind the selection of the proposed site and the rejection of other potential sites in Section 7.0 (p. 7.0-27). The analysis demonstrates that the chosen site best meets the Project's objectives while ensuring compliance with CEQA requirements.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.13:**

The commenter requests provision of CEQA Guidelines Sections 15091 and 15093 to the public. The commentor's comment related to access to CEQA Guidelines is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The CEQA Guidelines are publicly available at: <https://opr.ca.gov/ceqa/guidelines/> and [https://www.califaep.org/statute\\_and\\_guidelines.php](https://www.califaep.org/statute_and_guidelines.php).

CEQA Guidelines Sections 15091 and 15093 outline the requirements for findings and overriding considerations when approving projects that have significant environmental impacts, as summarized below.

CEQA Guidelines Section 15091 - Findings: This section requires that public agencies must make specific findings before approving a project that has been analyzed in an Environmental Impact Report (EIR) and found to have significant environmental impacts. The findings must:

1. Identify each significant effect.
2. Discuss whether the effect can be mitigated, and if so, adopt mitigation measures.
3. If mitigation measures or alternatives are infeasible, explain why.
4. State whether the impact is unavoidable even after the adoption of mitigation measures.

CEQA Guidelines Section 15093 - Statement of Overriding Considerations: This section allows a public agency to approve a project with significant and unavoidable impacts if it determines that the project's benefits outweigh those impacts. The agency must:

- Balance the economic, legal, social, technological, or other benefits of the proposed project against its unavoidable environmental risks.
- Make a Statement of Overriding Considerations if it concludes that the benefits justify approving the project despite significant environmental impacts.

The findings required by Section 15091 and the Statement of Overriding Considerations under Section 15093 are made available to the public as part of the environmental review process, ensuring transparency and adherence to CEQA requirements.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.14:**

The commenter requests clarification of the term "less than significant" The determination of "less than significant" impacts within the DEIR is based on a thorough environmental analysis conducted by qualified professionals and consultants in accordance with CEQA guidelines. These determinations are supported by data, modeling, and established thresholds for significance as defined by local, state, and federal regulations.

Process of Determination:

**Environmental Analysis:** The DEIR includes a comprehensive assessment of potential environmental impacts across various resource areas, such as air quality, noise, traffic, and biological resources. This analysis is detailed in Sections 5.1 through 5.20 of the DEIR.

**Significance Thresholds:** For each resource area, specific significance thresholds are defined based on regulatory standards, scientific data, and guidelines provided by agencies such as the California Air Resources Board (CARB), California Department of Transportation (Caltrans), and local ordinances. These thresholds are used to evaluate the potential impacts of the Project.

**Impact Assessment:** The environmental consultants analyze the Project's potential impacts against these thresholds. If the impacts are below these thresholds, they are considered "less than significant." If impacts exceed the thresholds, mitigation measures are proposed to reduce them to less than significant levels whenever feasible.

The analysis and determination of impact significance were conducted by environmental professionals and consultants with expertise in various resource areas. The draft DEIR undergoes a rigorous review process, including public comments and review by lead and responsible agencies. The final determination of significance is made by the lead agency, in this case, the City of Riverside, based on the comprehensive analysis provided by the environmental consultants and the input received during the public review process.

The comment provided does not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As it does not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does it reflect on the adequacy or content of the DEIR, it is deemed not relevant to the DEIR process. Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.15:**

The commenter expresses concerns regarding the Project's lack of mitigation under Threshold E under Hazards and Hazardous materials as well as the finding of "less than significant". The DEIR considers the proximity of the Project to the March Air Reserve Base/Inland Port Airport and evaluates the potential safety hazards associated with this proximity. The detailed analysis is provided in Section 5.9 Hazards and Hazardous Materials (pp. 5.9-14 - 5.9-24). The analysis considers factors such as residential and non-residential density, existing safety measures, and the recommendations of the Riverside County Airport Land Use Commission (ALUC).

The DEIR concludes that the Project would have a significant and unavoidable impact under Threshold E because it is located within the vicinity of the March Air Reserve Base/Inland Port Airport. This location poses potential safety hazards for residents and workers in the Project area due to the increased risk associated with air traffic operations.

**Mitigation Measures:** The DEIR discusses recommended conditions from the ALUC, which include:

- Informational brochures for prospective purchasers and tenants.
- Deed notices to ensure that all occupants are aware of the proximity to the airport and the associated risks.

However, despite these measures, the potential safety hazard cannot be entirely mitigated due to the inherent risks of being located near an active airfield. Thus, the impact remains significant and unavoidable.

While the DEIR identifies the impact under Threshold E as significant and unavoidable, it also states that no additional mitigation is required beyond the measures recommended by the ALUC. The "less than significant" determination mentioned in the comment refers to the overall assessment of residential impacts, where the DEIR considers other factors, such as noise and air quality, which are mitigated to less than significant levels.

The DEIR's conclusion of "less than significant" for residential impacts pertains to these other factors, which are adequately mitigated. The safety hazards related to airport proximity, however, are a distinct issue where mitigation measures cannot fully address the potential risks.

The determination of significant and unavoidable impacts under Threshold E is based on a thorough analysis of the Project's proximity to the airport and the associated safety hazards. The Project is allowed to be considered under CEQA regulations, which permit the approval of projects with significant and unavoidable impacts if a Statement of Overriding Considerations is adopted, demonstrating that the benefits of the Project outweigh these impacts.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.16:**

The commenter expresses that they disagree with the findings of Threshold A under Land Use and Planning and the lack of community involvement in the process. The DEIR analysis under Threshold A of Section 5.11 Land Use and Planning (p. 5.11-10) considers the Project's location, design, and compatibility with the surrounding community. The determination of "No Impact" under Threshold A is based on a thorough analysis of the Project's potential to divide the community. The Project site is on an underused commercial property, and the proposed development aims to revitalize this area without disrupting the existing residential community. The Project includes design features that promote connectivity and integration with the surrounding areas, such as pedestrian pathways and open spaces that enhance community cohesion rather than divide it. As such, the DEIR properly concludes there is no impact regarding potential to physically divide an established community.

The proposed Project Applicant sent postcards to a total of 768 neighbors, many of whom extended beyond a 1,000-foot radius, which exceeded the 300-foot noticing radius employed by the City for an Applicant hosted Open House Community Meeting on September 12<sup>th</sup>, 2023, in a vacant space within the Mission Grove Plaza (Unit 1C). In addition, the proposed Project Applicant hosted the Mission Grove Neighborhood Alliance's (MGNA) monthly meeting on October 9<sup>th</sup>, 2023, at the Mission Grove Plaza and provided refreshments and seating for 163 attendees. Prior to hosting the October 9<sup>th</sup>, 2023, MGNA meeting, the proposed Project Applicant attended the September 11<sup>th</sup>, 2023, MGNA meeting to extend the invitation to host the following month's meeting. Moreover, the proposed Project Applicant attended the May 29<sup>th</sup>, 2024, MGNA meeting



at the Canyon Crest Country Club to engage with MGNA executive committee prior to the DEIR public comment period deadline. The Project Applicant also met with two MGNA members on June 11, 2024. Thus, the proposed Project Applicant has put forth several efforts both before and during the DEIR public review period to notify and engage with the public and local community, providing the public with several opportunities to participate in the Project's planning and development process.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.17:**

The commenter expresses concerns on the number of residents projected for the Project and asks whether this would only be possible if the Project's land use was "waived". The commenter's comment related to number of residents and question about land use being "waived" is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. The DEIR analysis under Threshold A of Section 5.14 Population and Housing (p. 5.14-4) considers several factors to determine the potential for unplanned population growth, such as consistency with the City's General Plan. The General Plan anticipates growth and provides a framework for accommodating new development in a planned and orderly manner.

The Project proposes the construction of 347 residential units, which is anticipated to add approximately 829 new residents to the area. This growth is within the scope of what the General Plan has anticipated for this area. The Project's location on an underutilized commercial property ensures that it leverages existing infrastructure and does not necessitate extensive new infrastructure, which could otherwise lead to unplanned growth.

The DEIR concludes that the Project's impact on population growth is less than significant because the growth is planned and managed within the existing land use framework. The addition of new residents is consistent with the City's long-term planning goals and does not represent unplanned or uncontrolled growth. Although the Project is expected to introduce new residents, it includes measures to ensure adequate infrastructure, public services, and amenities to accommodate this growth without causing significant adverse impacts.

The Project has been designed to fit within the existing community and align with the City's broader goals for sustainable growth. This includes ensuring that the necessary infrastructure and public services are in place to support the new residents, thereby preventing any substantial unplanned population growth.

The DEIR's determination of "Less than significant" impact under Threshold A is based on a comprehensive analysis of the Project's consistency with the General Plan, the adequacy of existing infrastructure, and the managed approach to accommodating new residents. The Project does not induce substantial unplanned population growth but rather contributes to the planned development framework set by the City.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.18:**

The commenter questions why the Project is being considered if the Threshold A finding would be “significant and unavoidable”. The analysis under Threshold B can be found in Section 5.17 Transportation and Traffic (pp 5.17-13 - 5.17-21). The DEIR identifies significant and unavoidable impacts related to VMT because the Project would likely increase the number of vehicle miles traveled in the area. Despite efforts to reduce VMT through project design and mitigation measures, the impacts cannot be entirely mitigated to less than significant levels.

The DEIR proposes mitigation measures such as enhancing pedestrian and bicycle infrastructure, promoting transit use, and implementing transportation demand management strategies. These measures aim to reduce VMT to the extent feasible. Even with these mitigation measures, the DEIR concludes that the residual impact on VMT remains significant and unavoidable due to the inherent nature of adding a new residential development in the area.

Despite the significant and unavoidable impact related to VMT, the Project is being considered for several reasons. The Project provides substantial benefits, including the addition of high-quality residential units, which contribute to the housing supply in Riverside. The need for housing and the benefits associated with meeting this demand are considered in the decision-making process. CEQA allows projects with significant and unavoidable impacts to be approved if the lead agency adopts a Statement of Overriding Considerations. This statement documents that the benefits of the Project outweigh the unavoidable environmental impacts. The DEIR process includes opportunities for public comment and involvement. The Project has been reviewed by the community, and mitigation measures have been proposed to address concerns to the extent feasible.

The determination of “Significant and unavoidable” impacts under Threshold B is based on a comprehensive analysis of the Project’s VMT impacts. The DEIR outlines the mitigation measures proposed and explains why these measures cannot fully mitigate the impact to less than significant levels. The Project is considered because the benefits, such as addressing housing needs, are deemed to outweigh the significant and unavoidable impacts. A Statement of Overriding Considerations will be adopted if the Project is approved.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.19:**

The commenter directs the reader to “refer to questions/concerns that follow for available water supply,” thus refer to responses that follow, accordingly.

The comment provided does not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As it does not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does it reflect on the adequacy or content of the DEIR, it is deemed not relevant to the DEIR process. Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.20:**

The commenter asks if the CEQA Guideline 15121 can be provided for review. As outlined in Response 4.13 above, the CEQA Guidelines are publicly available at: <https://opr.ca.gov/ceqa/guidelines/> and [https://www.califaep.org/statute\\_and\\_guidelines.php](https://www.califaep.org/statute_and_guidelines.php). The commenter's comment related to the CEQA Guidelines are not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

CEQA Guidelines Section 15121 outlines the requirements for the EIR to ensure that the document provides sufficient information for public review and decision-making regarding the environmental impacts of a proposed project. This section specifies the content and purpose of the EIR, emphasizing the need for thorough analysis and public accessibility.

The DEIR for the proposed Project has been prepared in accordance with CEQA Guidelines Section 15121, ensuring comprehensive and accessible information is provided to the public and decision makers. The DEIR includes detailed analyses of environmental impacts, feasible mitigation measures, and alternatives to the proposed Project, as required by CEQA.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.21:**

The commenter questions how a threshold finding of "unavoidable and significant" would allow for the Project to be considered with no mitigation measures provided as well as how the finding of "less than significant" was found. The DEIR acknowledges that the Project may have significant and unavoidable impacts related to Hazards and Land Use & Planning despite proposed mitigation measures. This is a standard part of the CEQA process, which aims to provide a transparent and thorough analysis of potential environmental impacts, and it also outlines the rationale for considering such projects.

The Project would result in significant and unavoidable impacts related to inconsistency with applicable airport land use compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP) and applicable GP 2025 Policies CCM-11.1, LU-22.3, LU-22.5, and LU-69.1 related to the MARB/IPA LUCP.

Under CEQA, a project with significant and unavoidable impacts can still be approved if the lead agency adopts a Statement of Overriding Considerations. This statement justifies the project's approval by balancing its benefits against the unavoidable adverse environmental impacts. The

City of Riverside, as the Lead Agency, considers several factors in this decision such as project benefits, CEQA compliance, and public involvement.

The determination of "Less than significant" residual impacts refers to impacts that can be fully mitigated through proposed measures. For significant and unavoidable impacts, the DEIR clearly states that even with mitigation, certain impacts cannot be reduced to less than significant levels, and these are transparently disclosed.

The DEIR's identification of significant and unavoidable impacts is a result of rigorous environmental analysis and compliance with CEQA guidelines. The Project is being considered because its benefits are deemed to outweigh the significant adverse impacts, as justified in a Statement of Overriding Considerations. The DEIR ensures full disclosure and public participation, providing a comprehensive basis for decision making.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.22:**

The commenter asks how the project is addressing growth inducing impacts and to describe measures to reduce or lessen potential impacts. Page 2.0-7 of the DEIR does not include the analysis of growth inducing impacts. This information is located elsewhere in the DEIR. Ppage 2.0-7 includes a description of the overall format and contents of the DEIR. The DEIR addresses the potential growth-inducing impacts of the Project in Section 6.0 Other CEQA Considerations (pp. 6.0-9 - 6.0-10), and concluded that the Project is anticipated to contribute only approximately 1.4 percent of the anticipated population growth in the 6<sup>th</sup> Cycle Housing Element Technical Background Report. The approximate 1.4 percent incremental increase would be a less than significant increase and would not exceed both the estimated projection and the maximum projection of the City's General Plan 2025 EIR growth projections. The proposed Project would not spur population growth, rather, it is growth accommodating.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.23:**

The commenter questions how the lead agency complied with findings and mitigation. The lead agency, in this case, the City of Riverside, has complied with CEQA requirements for findings and mitigation through a structured process that ensures all significant environmental impacts identified in the DEIR are addressed. This process includes the preparation of Findings and a Statement of Overriding Considerations, as outlined in Section 1.0 Executive Summary (p. 1.0-6).

For each significant impact identified in the DEIR, the City has made the required findings based on substantial evidence. These findings are documented in the Final EIR. When approving a

project with significant and unavoidable impacts, the City must adopt a Statement of Overriding Considerations. This statement sets forth the specific social, economic, or other reasons that justify proceeding with the Project despite its significant environmental effects.

The City of Riverside has complied with CEQA requirements by preparing detailed findings for each significant impact, adopting a Statement of Overriding Considerations. These steps ensure that the Project's environmental impacts are mitigated to the extent feasible and that the benefits of the Project justify proceeding despite any unavoidable impacts.

The City of Riverside has complied with CEQA requirements by preparing a Mitigation Measure Reporting Program to appropriately track the implementation of mitigation measures and the responsible parties for those measures.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.24:**

The commenter questions why the nearby apartment complexes were not included in the Project location description. The DEIR provides a detailed description of the Project location in Section 3.0 Project Description, (pp. 3.0-1 - 3.0-3). The Project location is defined as the site where the new development will occur. This includes the boundaries of the specific parcel of land and the immediate context necessary to understand the environmental impacts of the Project. Multi-family residences to the north, across Alessandro Boulevard, are mentioned on p. 3.0-1. However, nearby existing apartments are not directly adjacent uses, and thus, are not discussed in detail in the Project location section to maintain clarity in the analysis. Multi-family residences near the Project site are also discussed in detail in Section 5.9, regarding consistency of the Project with surrounding development in Zone C2. (pp. 5.9-22 – 5.9-23.)

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.25:**

This comment is a repeat of comment 4.24; therefore, the response to comment 4.24 is the same as outlined above.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.26:**

The commenter requests clarification on TPM 38598 and would like to know why it was not part of the DEIR. Tentative Parcel Map (TPM) 38598, discussed in Section 3.0 Project Description (p.

3.0-14), is proposed to create legal parcels to support financing and conveyance of the Project. This involves subdividing the existing parcel into two distinct parcels. The DEIR does include TPM 38598 as part of the Project description, but it does not discuss the TPM in detail within the environmental impact sections. The reason for this is explicitly stated in Section 3.3.4: the TPM itself is for legal and financial structuring purposes and does not have a direct environmental impact. Therefore, detailed environmental analysis specific to the TPM is not required. The primary focus of the DEIR is on the physical development and operational aspects of the Project that could have direct environmental impacts.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.27:**

The commenter expresses concerns on the use of “averaging” within landscape setbacks. The commenter requests information regarding parking approvals by the City, the definition of tandem parking spaces, and proposed ideas for parking when residents do not pay for the parking. The commenter’s comments related to how landscape setbacks are calculated, how tandem spaces are defined, and if residents do not pay for parking are not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The Project’s design is reviewed in DEIR Section 3.0 Project Description (pp. 3.0-15 - 3.0-17). The Project meets the required landscape setbacks.

A 15% parking reduction request has been outlined for the Project site as noted in the Project’s Specific Plan Amendment, per City of Riverside Municipal Code 19.580.060.C.2.b. This reduction is subject to approval by the City. The DEIR discusses the rationale for this reduction, which includes considerations of promoting alternative transportation methods, enhancing pedestrian and bicycle infrastructure, and reducing reliance on private vehicles.

Additionally, the Project can still provide the required number of spaces (before the 15% reduction), with the inclusion of the 91 shared spaces.

The City’s parking requirements are established to ensure adequate parking for residents and visitors while managing traffic and land use efficiently. The proposed reduction aims to balance these objectives with broader sustainability goals, such as reducing vehicle miles traveled (VMT) and encouraging the use of public transit and other non-motorized transportation options. The City’s approval process includes a thorough review to ensure that the reduction does not negatively impact the community and meets the intent of the original code. The Project provides the required number of spaces (before the 15% reduction) with the inclusion of the 91 shared spaces. A parking analysis was conducted for the proposed Project and demonstrated there would be no shortage of parking.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.28:**

The commenter requests a definition of tandem parking spaces, asks about overflow parking spaces, and questions if nearby businesses have been informed of the increased parking demands. The commenter's question related to whether or not the nearby business have been informed of the commenters assumed increased parking demands is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. Tandem parking spaces are defined as parking spaces arranged one behind the other, where one vehicle must be moved to allow the other vehicle to enter or exit. This layout differs from side-by-side parking, where each vehicle has an independent space. Parking information is confirmed in DEIR Section 3.0 Project Description (pp. 3.0-16 - 3.0-17).

The DEIR outlines a comprehensive parking strategy to address the needs of the residents and minimize potential overflow into commercial parking areas. The Project includes a total of 513 new parking spaces, with an additional 91 proposed spaces to be shared with the existing adjacent retail site. The layout and allocation of these spaces, including the use of tandem parking, are designed to maximize efficiency and meet the Project's parking needs. Tandem parking spaces will be arranged front-to-back and are typically assigned to specific units to ensure coordinated use by tenants who agree to the arrangement. The Project includes a system where tenants can opt to pay for additional parking spaces beyond the one (1) parking stall provided to every unit within the rental unit fee, including tandem spaces (p. 5.17-18). This approach helps decrease or discourage vehicle ownership and ensure that parking spaces are used efficiently.

The DEIR explains that the Project proponents have coordinated with adjacent businesses to inform them of the potential for increased parking demand. This communication ensures that business owners are aware of the Project's parking arrangements and any potential impacts on their parking lots. The shared parking arrangement with the adjacent retail site will be formalized in a new covenant and restriction agreement between the residential developer and Mission Grove Plaza. This ensures that the shared parking is legally binding and clearly defined.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.29:**

The commenter questions whether the City or WMWD will be paying for utility improvements. The commenter's question related to who will be paying for utility improvements is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. The responsibility for funding and implementing utility improvements typically involves coordination between the Project developer, the City of Riverside, and the Western Municipal Water District (WMWD). The Project developer is generally responsible for the initial costs associated with utility improvements directly related to the new development. This includes on-site infrastructure and connections to existing utility systems. The City and WMWD may participate in funding improvements if the upgrades provide broader benefits to the community or enhance regional infrastructure. These contributions are often part of agreements

and partnerships established during the Project approval process. In this case, the Project developer is assuming full responsibility for these improvements.

Please refer to Response 4.9.

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted.

**Response 4.30:**

The commenter questions why the nearby apartments are not listed in the Project location description. The Project site setting, as described in Section 4.0 Environmental Setting (p. 4.0-1) of the DEIR provides a clear and focused description of the project parcel and its immediate surroundings. Multi-family residences to the north, across Alessandro Boulevard, are mentioned on p. 4.0-1. However, while nearby apartments are included in the broader analysis of land use compatibility, they are not mentioned in the project site setting section because they are not directly adjacent uses. This does not imply an avoidance of discussion regarding existing apartments; rather, it ensures that the analysis remains focused on the immediate project area and its direct impacts.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.31:**

The commenter requests the following definition:

CEQA Guidelines Section 15382:

Definition of Significant Effect on the Environment: A significant effect on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

For reference, the full text of CEQA Guidelines, including Section 15382, can be accessed online and is publicly available for download from the following website: [https://www.califaep.org/statute\\_and\\_guidelines.php](https://www.califaep.org/statute_and_guidelines.php)

The DEIR for the proposed Project has been prepared in accordance with CEQA Guidelines Section 15382, ensuring that all significant effects on the environment are thoroughly evaluated. The DEIR includes detailed analyses of environmental impacts, feasible mitigation measures, and alternatives to the proposed Project, as required by CEQA.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does



not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.32:**

The commenter requests access to Appendices G and H. The proposed Project's Notice of Availability of a DEIR indicates copies of the DEIR, which include all DEIR Appendices including Appendices G and H, had been made available for public viewing on the City's website and at a number of City facilities, including: the Riverside City Hall, Community & Economic Development Department; the Riverside Main Public Library; and the Riverside Public Library. The Notice of Availability additionally included information on who to contact at the City if unable to access the electronic copy of the DEIR.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.33:**

The commenter questions whether the Project's height and visibility were taken into account during the DEIR process. The DEIR addresses the visual character and aesthetic impacts of the Project in Section 5.1 Aesthetics (pp. 5.1-1 - 5.1-24). This section includes an analysis of how the Project will affect the visual landscape of the area, considering the height and design of the new buildings.

The DEIR includes visual simulations and impact assessments to evaluate how the new buildings will be perceived from various vantage points. The Project's design is evaluated for consistency with the City's General Plan and zoning regulations, which consider appropriate building heights and architectural styles to ensure compatibility with the surrounding area.

The visibility of the Project site from Alessandro Boulevard is partially blocked at various locations along Alessandro Boulevard by existing trees and buildings adjacent to and south of Alessandro Boulevard, between Alessandro Boulevard and the Project site, such as the Shell Gas Station, Circle K, Starbucks, Bank of America, McDonalds, etc. This determination is based on the analysis of sightlines and visual obstructions in the area. "Partial" visibility means that the Project will be visible from certain viewpoints along Alessandro Boulevard, but not fully or continuously visible from all points. Factors contributing to this partial visibility include existing landscaping, topography, and other structures that may obstruct views of the Project from certain angles.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.34:**

The commenter questions whether the proposed dog park will be for public use. The commenter also requests the definition of "enhance the aesthetics" and questions the Project's proposed

impact on aesthetics. The commenter's questions related to whether or not the dog park is for public use and to define "enhance the aesthetics" are not issues that are required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

Please refer to Response 4.8.

The term "enhance the aesthetics" refers to design and landscaping measures aimed at improving the visual appeal of the Project. Threshold C in Section 5.1 Aesthetics (p. 5.1-21) evaluates whether the Project would degrade existing public views of the site and its surrounding areas. The DEIR's evaluation under Threshold C considers the potential visual impact of the 57-foot buildings and concludes that, with appropriate design and mitigation measures, the Project will not significantly degrade existing public views. The analysis is supported by visual simulations and a comprehensive assessment of architectural and landscaping enhancements.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.35:**

The commenter expresses concerns regarding the proposed Project's height. The DEIR addresses the compatibility of the proposed Project with the surrounding area in Section 5.1 Aesthetics (pp. 5.1-2 - 5.1-3), including considerations of building height and visual character. The Project's proposed buildings are designed to align with the City's broader planning goals, even if there are no similar structures immediately adjacent to the Project site.

The proposed Project includes buildings taller than the existing structures in the immediate vicinity. However, this does not conflict with the City's long-term planning objectives, which may include accommodating higher density development in specific areas and the proposed buildings are below the maximum allowed within CR zone. The Project aims to provide high-quality residential units in an area designated for development, contributing to the City's goals of increasing urban density and housing availability. Taller buildings can accommodate more residents within a smaller footprint, promoting efficient use of land and infrastructure. The Project's design and landscaping comply with the City's Design Guidelines and Zoning Code and would not substantially degrade the existing visual character of the area.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.36:**

The commenter asks how it was determined that the project would not have substantial adverse impacts. The DEIR, Section 5.1 Aesthetics, Section 5.1.7 Cumulative Environmental Effects, (pp. 5.1-23 – 5.1-24) outlines the analysis to support the conclusion that the potential cumulative impacts from the Project are less than significant. As outlined in the DEIR, (p. 5.1-24), the lighting elements have no plans to increase lumens nor the elevation of the proposed structures to

increase and impede visual character. All projects within the MARB/IPA LUCP Zone C or higher that propose solar panels would be required to ensure it would not result in solar glare impacts, they would be expected to take into account the potential for glare caused by solar array on the roof of the Project. The solar power system array would emit a green glint glare. As of 2021 the FAA issued a policy that does not find that green glare would no longer create a hazardous glare. Therefore, this would not result in a substantial adverse impact either on a Project specific basis related to light and glare, or a cumulative perspective.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.37:**

The commenter asks various questions regarding the installation, use, and performance of EV charging stations planned for the Project. The Project complies with the requirements for providing electric vehicle (EV) charging stations for new construction (p. 5.17-22). The Project more than complies with the requirements for EV charging stations, exceeding the minimum 26 stations required by providing 41 stations. While the primary purpose is to serve residents, the management of these stations, including public access and potential reduced rates through grants, will be determined by the property owner or management company. The Project can accommodate a variety of EV types, including Tesla vehicles, by providing appropriate connectors and adapters.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.38:**

The commenter questions where the recycling center will be relocated. The commenter's question related to location of the recycling center is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. The DEIR includes information about the provision of recycling and waste collection facilities as part of the Project's design to ensure that waste management needs are adequately addressed. Section 3.0 Project Description (p. 3.0-23) identifies Athens, which is one of three of the City's franchise haulers (Burrtec, Athens, and CR&R), to provide solid waste disposal services for the Project. The Project will include designated areas for recycling and waste collection. There will be one set of trash and recycling chutes per building (5 sets of trash/recycling chutes total for the property). These areas are strategically located to ensure easy access for residents and efficient collection by waste management companies. The design of the recycling and collection locations takes into consideration the accessibility for waste management companies.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does

not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.39:**

The commenter questions the VMT analysis as well as the utility and usage of the constructed solar panels. The DEIR analyzes both trip generation and VMT in Section 5.17 Transportation (pp. 5.17-9 – 5.17-11 and 5.17-13 - 5.17-22). The DEIR Section 5.3 Air Quality evaluates the potential increase in air pollution due to the additional vehicles introduced by the Project and assesses the project's consistency with the City's General Plan 2025.

The Project incorporates several strategies to mitigate increased VMT and associated air pollution including measures to reduce single-occupancy vehicle trips, such as a car-sharing program, bicycle facilities, and improved pedestrian infrastructure. The proposed Project location increases the potential for people to walk and bike to surrounding retail and commercial uses and thereby aids in promoting connectivity to these nearby destinations. The Project also enhances access to public transportation to encourage residents to use transit options instead of personal vehicles. As noted previously, the Project provides 41 EV charging stations, exceeding the required minimum. This promotes the use of electric vehicles, which have lower emissions compared to conventional vehicles.

Emissions from vehicles are not associated with how many parking spaces there are, rather the number of vehicle trips generated by the Project and trip length. The air quality analysis that was completed for the Project and outlined in the DEIR, Section 5.3 Air Quality, was based on the trip generation and VMT outlined in those technical reports (Appendix I) and in the DEIR Section 5.17 Transportation. As outlined in the DEIR, Section 5.3 (pp. 5.3-25 -5.3- 29), the Project would not result in or cause NAAQS or CAAQS violations, would not conflict with the AQMP, and would not result in a cumulatively considerable net increase of any criteria pollutants for construction or operations, and thus would not have significant impacts. Further, the DEIR ensures that the Project aligns with the City's General Plan 2025, which includes policies and goals aimed at reducing air pollution and managing transportation impacts. The Project's mitigation measures, and design elements are consistent with these policies, supporting the City's broader objectives for sustainable development and environmental protection.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.40:**

The commenter questions whether the Project's solar panels comply with Riverside's "Green Power projects". The DEIR discusses the integration of solar power as part of the Project's energy conservation features, discussed in Section 5.6 Energy (p. 5.6-16). The inclusion of solar power supports the Project's alignment with both state and local environmental goals, including compliance with California's Green Building Standards (CALGreen) and Building and Energy Efficiency Standards for new buildings. These regulations include mandates for solar readiness and the integration of photovoltaic systems to meet part of the building's energy needs.

The solar power generated by the Project is intended to reduce the development's overall energy consumption. This includes powering common areas and potentially offsetting the energy use of individual residential units. The specific allocation of solar power to individual tenants and the impact on tenant billing will depend on the system's design and the agreements put in place by the property management. Solar power is often used to power common areas such as lobbies, gyms, and outdoor lighting, reducing the overall operational costs. The solar power generated may also be used to offset the energy consumption of the building's management and operational needs, such as office spaces, maintenance facilities, and other non-residential areas of the complex.

"Green Projects" are identified on the City of Riverside, Public Works, Green Projects website (located at <https://riversideca.gov/publicworks/sewer/green-projects>) which identifies two green projects at the Riverside Water Quality Control Plant (RWQCP) that use byproducts of the sewage treatment process to produce energy: Cogeneration and Biosolids. The Project's wastewater/sewer will be conveyed to and treated at the RWQCP. The Project's Sewer Study (Appendix J) concluded that the RWQCP's Master Plan Update proposed improvement project is adequate to meet the requirements of the proposed development for areas included in the City's hydraulic model and no changes to the Master Plan Update are needed for the proposed Project. Therefore, the project's sewer generation would contribute to these City "Green Projects" at the RWQCP that produce energy.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.41:**

Please refer to Response 4.37.

California Code of Regulations (CCR), Title 24, Part 11, also known as the California Green Building Standards Code (CALGreen), includes specific requirements for electric vehicle (EV) charging infrastructure in new construction projects. The DEIR ensures that the Project will comply with these requirements, providing adequate EV charging facilities as mandated.

CALGreen mandates that new multi-family residential buildings include a certain number of EV charging stations based on the total number of parking spaces. For residential buildings, at least 10 percent of the total parking spaces must be equipped with EV charging infrastructure. The Project exceeds the minimum requirements set by CALGreen by providing 41 EV charging stations, which is well above the minimum required number of 26 stations. This demonstrates the Project's commitment to sustainability and support for electric vehicle usage.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.42:**

The commenter questions whether the Project complies with and exceed applicable measures from the RRG-CAP. The Project complies with and, in several areas, exceeds the measures identified in the Riverside Restorative Growthprint Plan in Section 5.8 Greenhouse Gas Emissions (pp. 5.8-28 - 5.8-29), as demonstrated in Table 5.8-7 (pp. 5.8-35 – 5.8-40). In addition, the Project will comply with SR-2 and SR-13 as regulatory requirements. By integrating energy efficiency, renewable energy, water conservation, waste reduction, sustainable transportation, and green building practices, the Project supports the Plan’s goals of promoting sustainable development and enhancing environmental quality in Riverside.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.43:**

The commenter questions what the City will do to mitigate traffic conditions. RRG CAP project consistency with measure T-5 identified in Section 5.8 Greenhouse Gas Emissions (p. 5.8-37) focuses on traffic signal coordination, aiming to incorporate technology to synchronize and coordinate traffic signals along local arterials. This measure is specifically targeted at government agencies, as they have the authority and capability to implement and manage traffic signal systems across the city.

The DEIR notes that this objective is not applicable to private developers because the implementation of traffic signal coordination is beyond the scope and control of private development projects. It requires city-wide infrastructure adjustments and public sector management.

However, the City of Riverside has various strategies and responsibilities to improve traffic flow in the area surrounding the Project. These include traffic signal synchronization, roadway improvements, public transit enhancements, and the development of bicycle and pedestrian infrastructure. These measures, implemented by the City, will contribute to improved traffic management and reduced congestion in the vicinity of the Project.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.44:**

The commenter questions the viability of the Project for job creation and how work related traffic would increase due to the Project. The commenter’s question related to viability of the Project for job creation is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. The applicant anticipates approximately 3 full time employees (2 leasing agents and 1 maintenance) and 7 part time employees (4 landscape and 3) maintenance.

The Project proposes the development of a multifamily residential apartment complex on a site previously zoned for commercial use. This change in land use from commercial to residential is generally expected to generate less traffic compared to a commercial development. The Project will increase household density by providing 346 new residential units, equating to approximately 40 dwelling units per acre. Higher residential density supports the objectives of T-6, identified in Section 5.8 Greenhouse Gas Emissions (p. 5.8-37), by placing more households within a smaller area, promoting a more compact and efficient urban form. The Project is located near existing and approved commercial uses, providing residents with convenient access to shopping, dining, and services. This proximity encourages walking, biking, and shorter vehicle trips, contributing to reduced VMT.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.45:**

The commenter questions how the water usage will be reduced. The Project complies with Measure W-1, identified in Section 5.8 Greenhouse Gas Emissions (p. 5.8-39) and incorporates several measures discussed in Section 5.10 Hydrology and Water Quality (pp. 5.10-7 - 5.10-8) to achieve the required reduction in water usage. The Project will comply with the Green Building Standards Code (Title 24, California Code of Regulations), which mandates the use of water-efficient fixtures and systems in new construction. The Project will be equipped with low-flow plumbing fixtures, including faucets, showerheads, and toilets, which significantly reduce water consumption. These fixtures are designed to provide adequate performance while using less water than conventional fixtures. The Project will implement water-efficient landscaping practices, such as the use of drought-tolerant plants, efficient irrigation systems, and mulching. These practices help to minimize water use for landscaping purposes. Advanced irrigation controls, such as weather-based irrigation controllers and drip irrigation systems, will be utilized to optimize water use for landscaping. These systems adjust watering schedules based on weather conditions and soil moisture levels, preventing over-irrigation and reducing water waste.

The Project is required to comply with the Green Building Standards Code (Title 24, California Code of Regulations) in effect at the time of construction (issuance of grading permit), including water reduction requirements. The Code is updated and adopted on an 18-month cycle, triennial and intervening. The current code is in effect through December 31, 2025 (<https://calgreeninfo.com/>).

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.46:**

Please refer to Response 4.27.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.47:**

See Response 4.10.

The commenter asks what evidence there is that VMT would decrease by changing the land use. The Project's goal is to reduce VMT by promoting a mixed-use environment where residential, commercial, and recreational amenities are integrated. This integration is intended to decrease the need for long-distance travel by providing residents with nearby access to essential services and amenities.

By combining residential units with commercial spaces, the Project allows residents to access daily necessities, such as groceries, dining, and retail, within walking or biking distance. This reduces the need for car trips. The Project design emphasizes pedestrian-friendly pathways and connectivity, encouraging residents to walk rather than drive for short trips. Per the VMT analysis within the DEIR, CAPCOA 2021 transportation measure "T-18. Provide Pedestrian Network Improvement" was used to estimate the VMT reduction due to project related enhancements in pedestrian access and connectivity. The CAPCOA methodology requires existing sidewalk length in the project study area in addition to the length of sidewalk being provided by the project. In order to estimate the existing sidewalk length, a survey was conducted along the proposed project frontage. Based on the survey, the project study area includes 9.85 miles of centerline or 19.7 miles of sidewalk (9.85\*2 for both sides of the street). The project proposes to add approximately another 0.57 miles of sidewalk/pedestrian access. Therefore, this mitigation measure may reduce the project's VMT by approximately 0.14%.

In addition, when comparing the net vehicle trip generation of the former K-Mart use to the proposed Project, the former K-Mart has 164 more PM peak hour trips and 1,663 more daily trips.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.48:**

The commenter asks about evidence of compliance with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan MARB/IPA LUCP. The DEIR includes specific sections that address the Project's compliance with the MARB/ IPA LUCP.

Relevant Sections in the DEIR:

DEIR pp. 5.9-22 - 5.9-23: These pages in the DEIR provide specific details on the Project's compliance with the Land Use Compatibility Plan, including analyses of noise, safety, and height restrictions.



Section 6.0-2 Cumulative Impacts: This section further discusses how the Project aligns with regional planning efforts, including the compatibility plan for the March Air Reserve Base/Inland Port Airport.

The DEIR demonstrates compliance with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, with the exception of the residential density criteria, through detailed analyses and coordination with relevant agencies. The Project adheres to noise and safety zone regulations, building height restrictions, and notification requirements. The DEIR's specific sections and appendices provide the necessary evidence to confirm that the Project meets nearly all applicable standards and guidelines set forth in the compatibility plan.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.49:**

The commenter expresses concerns on whether the Project would be compliant to LU-22.5. The City of Riverside takes several steps to ensure that Policy LU-22.5 and other relevant policies are applied and feasible for new developments within airport influence areas. As outlined in the DEIR, Section 5.11 Land Use and Planning, Table 5.11-1 Consistency with Applicable General Plan Policies (p. 5.11-35), the Project is consistent with Policy LU-22.2 as follows: "The Project site is located within the March Air Reserve Base (MARB) airport influence area, within Compatibility Zone C2 of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). Therefore, the Project was submitted for review to Riverside County Airport Land Use Commission (ALUC) staff who prepared a Staff Report (dated September 14, 2023) analyzing the Project's consistency with applicable airport land use compatibility criteria. The Riverside County ALUC Staff Report for the project concluded that the project was inconsistent with the MARB/IPA ALUCP based on the fact that it exceeds the Zone C2 residential density criteria maximum of 6.0 du/ac. The Staff Report concluded the Project was consistent with non-residential average intensity (calculating with two different methods and non-residential single-acre intensity). The City of Riverside Planning Commission and City Council will consider Riverside County ALUC findings and the Project's inconsistency with the residential density criteria of the MARB/IPA LUCP when considering the Project for approval."

Although found inconsistent only with the residential density criteria, the General Plan and Zoning Code allow the City to overrule the ALUC inconsistency determination consistent with the California Utilities Code § 21670.

The DEIR includes a thorough review of the Project's partial compliance with airport land use compatibility policies. Section 5.9 Hazards and Hazardous Materials (pp. 5.9-22 - 5.9-23) provides detailed analysis of the Project's consistency with the land use compatibility plan for the March Air Reserve Base/Inland Port Airport. The Project is evaluated against the safety and noise zones defined in the compatibility plan. The City ensures that the Project does not encroach upon critical areas that could pose safety risks or be adversely affected by airport noise.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.50:**

The commenter questions the City's consideration of the proposed Project when it exceeds the allowable residential density. The City is considering an approval or denial request for the Mission Grove Apartments Project despite its residential density exceeding the maximum allowable limit in Compatibility Zone C2 because the applicant has appropriately submitted entitlements and have met the standards of a complete application. The City Municipal Code and California Utilities Code include a process for the City to overrule the ALUC inconsistency determination which the project has followed and will be considered by the City Council for approval or denial.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.51:**

The commenter questions whether the calculation for determining total occupancy based on parking spaces is before or after the 15% reduction in parking.

The DEIR provides a method for determining total occupancy density based on the number of parking spaces provided or required, multiplied by an average vehicle occupancy. This method is used to ensure that the Project complies with the average intensity criterion set for Compatibility Zone C2, which is 200 people per acre (p. 5.9-15).

ALUC calculated average intensity by multiplying the number of parking spaces provided or required (whichever is greater), by the average vehicle occupancy (assumed to be 1.5 persons per vehicle). ALUC misstated the number of spaces provided by the project and found that based on the number of parking spaces provided (misstated as 347 standard vehicles), the total occupancy would be estimated at 521 people for an average intensity of 53 people per acre, which is consistent with the Zone C2 intensity criterion of 200 people per acre.

However, the Project provides a total of 604 spaces, which is after the Project's requested 15% reduction. As such, using ALUC's methodology, the total occupancy would be estimated at 906 people, for an average intensity of 91 people per acre. This remains considerably lower than Zone C2 average intensity criterion of 200 people per acre. Thus, while the unit count may exceed ALUC's residential density requirements, the actual number of people onsite would be much lower than what ALUC would allow in Zone C2 if this were a commercial development, and accordingly would not impose a safety impact due to the intensity of people onsite in the event of an emergency.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does

not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.52:**

The commenter questions what improvement will improve delays and how the delay times were determined. The DEIR provides specific data and analysis on the expected reduction in peak hour delay due to the proposed improvements. The traffic impact study included in the DEIR evaluates current and projected traffic conditions at key intersections and roadways affected by the Project. The study uses traffic modeling software to simulate peak hour traffic conditions and assess the effectiveness of proposed improvements in reducing delays. The analysis, provided in Appendix I, shows that the proposed improvements are expected to reduce peak hour delay from 197.3 seconds to 152.9 seconds at critical intersections. This reduction is achieved through a combination of traffic signal optimization, roadway enhancements, and other traffic management measures. The data and methodologies supporting these findings are documented in the traffic impact study and technical appendices included in the DEIR.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.53:**

The commenter questions whether the FAAOES should be reviewed. The Project's total elevation of 1,652'2" feet amsl, as discussed in Section 5.9 Hazards and Hazardous Materials (p. 5.9-18), is below the threshold of 1,710 feet amsl, which means FAA Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) review is not required. The Project is in compliance with FAA Part 77 regulations and will have no impact on navigable airspace.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.54:**

The commenter questions whether the City Council is knowledgeable of the procedures to overriding ALUC and what the pros and cons of presenting to City Council are. The commenter's questions are not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The City's RMC Title 19, Section 19.149.090 – Overrule procedures, outlines that the City Council of the City of Riverside, by a two-thirds vote(), has the authority to overrule the Riverside County Airport Land Use Commission (ALUC) decision based on specific findings that the proposed Project is consistent with the purposes of ALUC law. The City Council is knowledgeable of the process and steps required to proceed with this authority.

It is not a question of pros and cons in presenting to City Council, the Project is required to be presented to City Council for consideration in order to comply with the law.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.55:**

The commenter questions how it was determined by the owner and the City to be less than significant. See Response 4.49 above The DEIR, Section 5.9.8 (pp. 5.9-25 – 5.9-27) outlines how the less than significant cumulative environmental effects determination was concluded. Although found inconsistent only with the residential density criteria, the General Plan and Zoning Code allow the City to overrule the ALUC inconsistency determination, consistent with the California Utilities Code § 21670.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.56:**

The commenter questions how to access the MARB/IPA LUCP PDF. The MARB/IPA LUCP is accessible as a PDF that can be viewed directly in the browser on the Riverside County Airport Land Use Commission (ALUC) website. This ensures that the document is readily available to the public without the need for proprietary software like Adobe Acrobat. In addition, Adobe Acrobat Reader is a free viewing application that is available at <https://get.adobe.com/reader/>.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.57:**

The commenter questions when the Green Action Plan would be available for review. The City's 2012 Green Action Plan had a sunset in 2020 and the remaining plan in effect is the City's Restorative Growthprint – Climate Action Plan (RGP-CAP). The City's 2012 Green Action Plan will not be updated. Rather, it will be superseded by the new Climate Action Plan as part of the General Plan Update currently underway.

As such, the DEIR Section 5.10 Hydrology and Water Quality (pp. 5.10-6 - 5.10-7) is revised as follows:

**~~City of Riverside Green Action Plan~~**

~~The City of Riverside is committed to becoming a clean, green and sustainable community. Beginning in 2005, a task force of citizen volunteers assembled to outline sustainability goals resulting in the City's 2009 designation by the California Department of Conservation as an~~

~~“Emerald City”. Developed by the Green Accountability Performance Committee, the Green Action Plan in its eighth iteration lists 19 goals and more than 50 tasks for the City to achieve additional sustainability goals and reduce its ecological footprint.~~

~~Goal 16 of the current Green Action Plan states, “Reduce per capita water usage 20 percent citywide by 2020” and Goal 17 states, “Increase the use of recycled water by 30 percent by 2020, based on the 2008 baseline (GAP, p. 32).” An update to the Green Action Plan is currently pending by the City.~~

~~In order to effectively conserve water, the Project includes water conservation and efficiency measures as discussed in Section 3—Project Description. The Project is also subject to RMC Chapter 14.22—Water Conservation that includes the Water Conservation Ordinance, drought plan, and water conservation programs that help water users throughout the City conform to local and state regulations for water conservation including drought related regulations.~~

It should be noted that even with these revisions to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

**Response 4.58:**

The commenter identifies typos/errors in Section 5.11 Land Use and Planning of the DEIR. DEIR Section 5.11 (p. 5.11-1), is revised as follows:

The Mills Water Filtration Plant operated by ~~Western Municipal Water District~~ Metropolitan Water District creates a relatively large expanse of open space that abuts Sycamore Canyon Wilderness Park on the north side of Alessandro Boulevard on the community’s easterly edge.

It should be noted that even with these revisions to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

**Response 4.59:**

The commenter questions the "potential noise impacts and inadvertent flight related emergencies". The DEIR includes a comprehensive noise analysis in Section 5.13 Noise and discusses compliance with various regulations, such as the California Code of Regulations (pp 5.13-9 - 5.13-115). The Project will incorporate enhanced soundproofing measures, including noise-insulating windows, doors, and building materials. Building orientation and design will minimize noise intrusion, and strategic landscaping will act as a natural sound barrier, reducing noise impacts on residents.

The Project's maximum building height of 57.2 feet has been evaluated for compliance with FAA regulations and the MARB/IPA Land Use Compatibility Plan (LUCP). The height is below the FAA Part 77 threshold for requiring an Obstruction Evaluation/Airport Airspace Analysis (OE/AAA), ensuring it does not pose significant risks to air navigation. As outlined in Section 5.13 Noise (pp. 4.13-24 - 4.13-25), although the Project site is located in the Zone C2 based on the MARB/IPA LUCP, the Project site is outside the 60 dBA CNEL contour. Therefore, the Project site would not be exposed to aircraft noise exceeding the exterior noise standards of 65 dBA CNEL based on the MARB/ IPA LUCP Countywide Policy 4.1.5.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.60:**

Please refer to Table 2.2-1: Topical Responses to Comments.

The commenter questions how community engagement shaped the Project. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.61:**

The commenter questions whether the RMC Title (1-10) is satisfied in the Project design and inquires what the phrase "integration of uses...pedestrian connectivity, walkability and shared uses" means. The Mission Grove Apartments Project meets the requirements of Riverside Municipal Code (RMC) Title 19 through its layout and design, discussed in Section 3.0 Project Description (pp. 3.0-6 - 3.0-23). The Project integrates residential units with compatible non-residential uses, such as retail and personal services, creating a synergistic environment that supports both residential and commercial activities. The layout promotes interaction between residential, commercial, and employment uses, reducing dependency on automobiles, improving air quality, decreasing urban sprawl, and facilitating public transit use. Additionally, the Project meets all development standards and will require no variances.

The Project supports transit-oriented development by providing easy access to public transportation. It revitalizes the area by integrating residential uses into a previously commercial space, creating an active street life and enhancing local business vitality. The mixed-use nature of the Project provides an alternative to small shopping centers by combining residential and commercial uses in a cohesive development. It fosters pedestrian-oriented activities with compact, walkable areas, increasing foot traffic and supporting local businesses.

The Project increases the area available for residential development and offers alternative housing types, addressing housing shortages. It includes spaces that support live/work activities, providing flexibility for modern work trends. The Project promotes medium- and high-density residential development close to employment centers and services, reducing commuting

distances and supporting sustainable growth. The design allows for varied land uses and structures, including adaptive reuse of existing structures, ensuring future adaptability.

The Mission Grove Apartments Project complies with RMC Title 19 by integrating a mixture of compatible land uses, promoting sustainable development, and enhancing the interaction between residential, commercial, and employment areas. This design supports transit-oriented development, revitalizes commercial areas, fosters pedestrian-oriented activity, and provides diverse housing options, contributing to a vibrant, sustainable community.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.62:**

The commenter indicates there is little pedestrian or cyclist activity to the Project site. The commenter's comment related to the amount of pedestrian and cycling activity to the site is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The terms "integration of uses," "pedestrian connectivity," "walkability," and "shared uses" refer to the Project's design principles aimed at creating a cohesive, accessible, and functional community.

"Integration of uses" means combining residential, commercial, and recreational spaces within the same development to create a synergistic environment where residents can live, work, and play without needing to rely heavily on cars.

"Pedestrian connectivity" involves designing pathways and sidewalks that link various parts of the Project and the surrounding areas, making it easy for people to walk from one place to another.

"Walkability" refers to the ease and safety of walking in the area, enhanced by features like wide sidewalks, pedestrian crossings, and attractive public spaces.

These design elements, discussed in Section 3.0 Project Description (pp. 3.0-6 - 3.0-23), are not solely for new tenants but are intended to benefit the entire community by promoting a more active, less car-dependent lifestyle. The Project aims to become a destination that encourages more pedestrian and bicycle traffic, contributing to the vitality of the neighborhood.

While current levels of pedestrian and bike activities may be low, the Project's enhancements are expected to attract more such activities over time, offering long-term benefits to the neighborhood by fostering a more connected and vibrant community.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.63:**

Please refer to Response 4.62.

The commenter expresses concern that the DEIR ignores the single-family residences nearby. The DEIR section addressing Threshold A evaluates whether the Project would physically divide an established community. The Project site, currently occupied by a vacant retail building and parking lot, is slated for redevelopment into a mixed-use environment that combines medium- to high-density residential and retail spaces.

While the DEIR focuses on the benefits of the new mixed-use development, it does consider the existing housing makeup, which is primarily single-family residences. The proposed apartment buildings of the Project are pushed back further away from Mission Village Drive than the existing vacant K-Mart building, which provides a greater transition between the adjacent single-family residences and the proposed apartment buildings. The Project aims to integrate seamlessly into the existing community by enhancing connectivity and accessibility. The design includes features such as pedestrian pathways, marked crosswalks, and shared amenities that connect the new development with the surrounding neighborhood, including single-family homes.

The proposed Mixed Use-Urban land use and zoning aim to integrate residential apartments into an existing retail environment, enhancing community connectivity and reducing the reliance on cars. The Project's central location and integration with existing retail spaces create new housing opportunities without displacing current residents, thereby maintaining community cohesion.

The development and design improvements encourage walkability and connectivity, promoting a more cohesive and integrated community. The Project's proximity to amenities and transit corridors further ensures that it supports and enhances the existing neighborhood, rather than dividing it.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.64:**

Please refer to Response 4.62.

The commenter questions what job opportunities would be available via the Project. The commenter's question related to job opportunities is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

As outlined in Response 4.44, the applicant anticipates the Project will have approximately 3 full time employees (2 leasing agents and 1 maintenance) and 7 part time employees (4 landscape and 3) maintenance. Although the Project will generate a few jobs, it is not considered a new job center.

The DEIR addresses Policy AQ-1.5, which encourages infill development projects within urbanized areas that include job centers and transportation nodes. While the Project primarily consists of residential development, it is strategically located within close proximity to various existing commercial and retail businesses, effectively integrating with nearby job centers.



The Project itself does not include new job centers within its development. However, it supports Policy AQ-1.5 by providing residents with easy access to nearby employment opportunities and transportation options. The Project site is adjacent to a bus stop with two bus lines along Mission Village Drive, enhancing connectivity to the broader urban area and facilitating access to job centers.

In summary, while the Project does not directly create new job centers, it aligns with Policy AQ-1.5 by situating residential units within an urbanized area near existing commercial and retail businesses and transportation nodes, thereby supporting access to job centers and reducing dependency on automobiles.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.65:**

Please refer to Response 4.62.

The commenter again expresses concerns that they have not witnessed pedestrian or cyclist traffic in the area near the Project. The commenter's comment related to lack of pedestrians and cyclists is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The Project supports Policy AQ-1.7 by focusing on creating an environment that reduces vehicle trips through the integration of various uses, pedestrian connectivity, walkability, and shared uses. The Project involves infill housing development that replaces a vacant retail building, situated near existing businesses, services, and bus stops. This strategic location increases walkability and access to public transportation.

Integration of uses means combining residential units with nearby commercial and service-oriented establishments, creating a mixed-use environment that reduces the need for long car trips. Pedestrian connectivity refers to designing pathways and sidewalks that connect the Project site with surrounding amenities, encouraging walking and biking. Walkability is enhanced by the design features that make it safe and convenient for residents to walk to nearby destinations.

These features are not solely for the new tenants but are intended to benefit the entire community by promoting more pedestrian and bicycle traffic. Although current levels of such activities may be low, the enhancements are expected to attract more pedestrians and cyclists over time, offering long-term benefits to the neighborhood by fostering a more connected and vibrant community.

The Project aligns with Policy AQ-1.7 by promoting infill housing that encourages walkability and reduces vehicle trips, ultimately supporting the City's goals for sustainable urban development.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does

not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.66:**

The commenter questions how the Project will "promote community self sufficiency and discourage automobile dependency, while removing public access driveways (increased traffic into other entries to the existing shopping center)".

The Project supports Policy AQ-1.12 by promoting community self-sufficiency and discouraging automobile dependency through several integrated features, discussed in Section 5.17 Transportation (pp. 5.17-14 - 5.17-19). The development's design encourages residents to utilize alternative transportation methods and reduces reliance on automobiles.

The Project includes pedestrian pathways and bicycle infrastructure, such as bike lockers, to facilitate non-vehicular travel. While the commenter suggests these features are of minimal benefit, they are integral to promoting a shift towards more sustainable transportation methods. The proximity of the Project to existing commercial and retail businesses ensures that residents can access essential services and amenities within walking distance, thereby reducing the need for car trips.

The removal of certain public access driveways and the rerouting of traffic to other entries within the existing shopping center are designed to optimize traffic flow and enhance pedestrian safety. By creating a more walkable environment and strategically managing vehicle entry points, the Project aims to reduce congestion and improve overall accessibility.

The Project's proximity to public transportation options, including nearby bus stops, further supports the reduction of automobile dependency. By providing easy access to public transit, the Project encourages residents to use alternative modes of transportation, which contributes to decreased vehicle emissions and improved air quality.

In conclusion, while the immediate benefits of walk paths and bicycle lockers may seem limited, these features are part of a broader strategy to promote sustainable living and reduce automobile dependency. The Project's design, combined with its strategic location, supports community self-sufficiency and aligns with Policy AQ-1.12's objectives.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.67:**

Please refer to Table 2.2-1: Topical Responses to Comments.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.68:**

The commenter expresses concerns that the community should not have to accept the proposed Project as it "would not be consistent with the current General Plan land use designation". The DEIR acknowledges that the Project is not consistent with the current Mission Grove Specific Plan land use designation. However, the Project includes a Specific Plan Amendment to address this inconsistency. The amendment process ensures that the Project aligns with broader planning goals and objectives set by the City.

Regarding air quality, the DEIR explains that the Project will not exceed the assumptions in the Air Quality Management Plan (AQMP) or cause emissions that surpass AQMP guidelines. Detailed analysis in Section 5.3 Air Quality (pp. 5.3-20 - 5.3-29), of the DEIR shows that both construction and operational emissions will remain within the South Coast Air Quality Management District (SCAQMD) regional and localized thresholds.

The public's acceptance of the Project, despite the initial inconsistency with the General Plan, is not under the purview of CEQA. The City Council of Riverside is the responsible party in consideration of the Project and the decision on whether to approve the GPA as part of the Project's proposed entitlements.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.69:**

The commenter questions why the public should agree with the installation of EV charging stations, as there are none currently on the site. The Project design includes the provision of electric vehicle (EV) charging stations as part of its commitment to energy efficiency and compliance with CALGreen Building Standards, along with alignment to the applicable objectives of the City's General Plan outlined in Section 5.17 Transportation (pp 5.17-5 – 5.17-7). Specifically, the Project proposes a total of 41 EV charging stations, which exceeds the minimum requirement of 26 stations based on the 513 parking spaces provided. Additionally, the Project will include 180 EV capable and EV ready spaces.

This approach aligns with Policy AQ-5.3, which encourages the use of renewable energy sources and supports broader environmental goals, such as reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT). The inclusion of EV charging stations is part of the Project's strategy to promote the adoption of electric vehicles, contributing to a reduction in emissions and supporting the City's sustainability objectives. Although there are currently no EV charging stations in or around the Project location, the introduction of these stations is required by law (2022 Title 24 CalGreen Standards) and designed to meet future demand and encourage the transition to renewable energy sources and reduction of VMTs. The City's agreement to this requirement reflects its commitment to promoting sustainable development and aligning with state and local environmental policies.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does

not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.70:**

The commenter requests more information pertaining to the proposed improvements that are designed to reduce delays and further analysis of the methodology that determined the result. The DEIR addresses the need for improvements to reduce traffic delays and maintain acceptable Levels of Service (LOS) on arterial streets, specifically in relation to Policy CCM-2.3. The Project's impact on traffic, particularly at key intersections, has been analyzed, and several improvements have been recommended to mitigate delays.

The data and analysis supporting the claim that peak hour delay at the intersection of Alessandro Boulevard and Cannon Road will improve from 197.3 seconds to 152.9 seconds are detailed in the Transportation Operation Analysis and VMT (Appendix I of the DEIR). This analysis shows that while the intersection currently operates at a deficient LOS F, the proposed improvements will reduce delays and improve traffic flow.

The proposed improvements include optimizing traffic signal timing, especially during peak hours. These measures are designed to ensure that, despite the Project's contribution to traffic, the overall delay during peak hours will be reduced compared to the current conditions without the Project.

The improvements are part of a broader strategy to address operational deficiencies at key intersections and roadway segments, ensuring that traffic conditions remain manageable and do not worsen due to the Project. While some intersections will continue to operate at a deficient LOS, the recommended improvements will mitigate the impact and enhance overall traffic conditions.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.71:**

The commenter asks how fair share was determined, if the MG residents will have a say in how funds are spent, if the City can identify what improvements will be made, how was "consistent" determined, if the City agrees there are no feasible improvements, and if the City would consider other alternatives.

Per page 11-2 of the Traffic Operations Analysis (Appendix I) of DEIR, the Project's fair share has been calculated based on the project traffic as a percentage of total growth from existing to cumulative conditions. The "fair share" contribution of 3.22 percent is based on the Project's proportional impact on traffic growth at the intersection of Trautwein Road and Mission Village Drive. This percentage reflects the Project's share of the total anticipated traffic increase from existing conditions to cumulative conditions with the Project. The detailed calculations and data supporting this percentage can be found in the Transportation Operation Analysis (Appendix I of the DEIR).

The fair share contribution is a funding mechanism that translates to the monetary amount the Project will pay to the City to help offset operational deficiencies at the identified intersections. The exact amount of money the City will receive depends on the overall cost of the required improvements. The funds collected will be allocated toward traffic mitigation measures and infrastructure improvements aimed at reducing the Project's impact on local traffic. The fair share fees collected are to be used towards improving the specific intersection being impacted. They are not to be applied to alternative roadway improvements at the discretion of the City or from community input.

As outlined in the DEIR, Table 5.11-1 Consistency with Applicable General Plan Policies, pp. 5.11-18 – 5.11-19, Level of Service (LOS) analyses were conducted for intersections and roadway segments in the Project area, and some were forecast to operate at an unsatisfactory LOS for Opening Year and Cumulative With Project Conditions. However, these intersections and roadway segments operate at an unsatisfactory LOS under Without Project Conditions, as well. Improvements have been recommended at study intersections where the proposed Project is forecast to create or contribute to operational deficiencies under Operating Year and Cumulative conditions where feasible improvements could be identified. It should be noted that with the implementation of the proposed improvements, the intersection of Alessandro Boulevard/ Cannon Road is still forecast to operate at a deficient LOS F, which is what the intersection currently operates at. However, the improvements will improve the delay under With Project Conditions to better than the corresponding delay under Without Project Conditions. Project associated improvements would decrease the intersection's A.M. Peak Hour delay from 197.3 seconds to 152.9 seconds. The intersection of Trautwein Road/ Alessandro Boulevard is forecast to operate at a satisfactory LOS D under the Opening Year and Cumulative with the recommended improvements. The intersection currently operates at an unacceptable LOS E during A.M. hours. The intersection of Trautwein Road/Mission Village Drive is forecast to continue to operate at a deficient LOS. The intersection currently operates at LOS E under no Project conditions and there are no feasible improvements at this intersection for all Project scenarios that would cause the intersection to operate at a more acceptable level. As such, the Project would pay its fair share of the cost required to offset operational deficiencies. Since there are no feasible improvements for the Trautwein Road/ Mission Village Drive intersection, the Project's fair share would be based on Project traffic as a percentage of total growth from existing to cumulative conditions, which would be a fair share percentage of 3.22%. For the intersection of Mission Grove Parkway/Plaza Driveway 2, it is forecast to operate at an acceptable LOS under all analysis scenarios: an LOS B without the Project and LOS C with the Project. However, the northbound left-turn and eastbound left-turn queues would exceed the available storage under Opening Year and Cumulative With Project scenarios. Therefore, improvements were identified at this intersection to alleviate the respective queuing deficiencies. Although LOS is no longer a CEQA impact, it is addressed for analysis of the Project's consistency with applicable General Plan policies. The "Consistent" level was determined based on the Project's adherence to applicable policies and its proportional contribution to traffic mitigation efforts. The Project is consistent with City policies by paying its fair share to mitigate any LOS deficiencies.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.72:**

The commenter questions if the city has considered time of use restrictions for trucks and autos. The DEIR does not specifically address time of use restrictions for trucks and autos as it is not required to be analyzed under CEQA. CEQA's focus is on the impacts of a Project on the environment, not on existing or Project caused traffic congestion. .

In the context of the Mission Grove Apartments Project, while the DEIR does not specifically mention the implementation of time of use restrictions, it does include several transportation demand management (TDM) strategies discussed in Section 5.17 Transportation (pp. 5.17-14 - 5.17-19) based on the implementation recommendations presented in the Transportation Operation Analysis (Appendix I) and local and state regulations. Additionally, the City is committed to exploring and implementing effective traffic management solutions as part of its ongoing efforts to address traffic impacts and improve overall transportation efficiency..

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.73:**

The commenter questions why existing driveways will be converted to gated driveways for resident use only and whether this will increase congestion. The commenter's questions related installing gates at the driveways is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The Project includes gating certain driveways and sidewalks for resident access only, specifically Project Driveway 2 on Mission Grove Parkway and the driveway on Mission Village Drive. This design decision aims to enhance the security of the residential area, aligning with Policy CCM-2.7, which emphasizes limiting driveway and local street access to maintain traffic flow quality. An additional study, the Intersection and Driveway Queuing Analysis, was conducted as part of the Traffic Operation Analysis (Appendix I) to ensure that any adverse impacts to Mission Grove Plaza were fully accounted for. For the intersection of Mission Grove Parkway/Plaza Driveway 2, the northbound left-turn and eastbound left-turn queues would exceed the available storage under Opening Year and Cumulative With Project scenarios. Therefore, improvements were identified at this intersection to alleviate the respective queuing deficiencies.

While restricting access to these driveways may increase the use and congestion at other entrances to the shopping center, the overall traffic flow is expected to be managed effectively through consolidated driveways and controlled access points. The Project maintains four primary driveways within the shopping center, with Driveways 1, 3, and 4 remaining full access points, thereby ensuring adequate ingress and egress for retail customers and residents.

The removal of the existing full access shopping center driveway on Mission Village Drive and conversion of Project Driveway 2 to a right-out egress only driveway are part of the efforts to streamline traffic flow and reduce potential conflicts on arterial streets. These measures are designed to balance the needs of the residential and commercial components of the Project while maintaining overall traffic efficiency.

Gating certain driveways and sidewalks for resident use is intended to enhance security and align with traffic flow policies. While it may lead to increased use at other entrances, the Project's design incorporates measures to manage traffic effectively and maintain a desired quality of traffic flow. The City and Project owner will continue to monitor traffic patterns and make necessary adjustments to ensure the efficient movement of vehicles and pedestrians.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.74:**

The commenter states concerns regarding the walkability and bikeability of the Project area and the pathways throughout. The DEIR addresses Policy CCM-2.9, which emphasizes designing street improvement projects comprehensively, considering factors such as street trees, pedestrian walkways, bicycle lanes, and connectivity to enhance air quality and reduce noise. The proposed Project includes several elements to support these goals.

The Project will include paved walkways and marked crosswalks throughout the Project site, ensuring resident paths connect seamlessly with existing public paths along Mission Grove Parkway and Mission Village Drive through its layout and design, discussed in Section 3.0 Project Description (pp 3.0-6 - 3.0-23). These pathways are designed to enhance walkable and bikeable connectivity between the Project's residential areas and the surrounding shopping centers. This design promotes non-vehicular travel, reducing vehicle emissions and improving air quality. Driveways gated for residential access will still provide street facing infrastructure such as paved walkways and bicycle paths accessible to the public. The Project adds 0.57 mile of sidewalk/pedestrian access to the existing pedestrian network in the area. (pp. 5.17-15 – 5.17-16.)

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.75:**

The commenter requests more information pertaining to the proposed improvements that are designed to reduce delays and further analysis of the methodology that determined the result. The DEIR addresses the improvements proposed by the Project owner and the City to reduce traffic delays and Vehicle Miles Traveled (VMT). The specific improvement measures and data analysis supporting the reduction in peak hour delay from 197.3 to 152.9 seconds are detailed in

the Transportation Operation Analysis (Appendix I of the DEIR). The proposed improvements include optimizing traffic signal timing and extending turn lanes to reduce delays and improve the overall efficiency of the transportation network.

The analysis conducted for the DEIR shows that these improvements will significantly reduce peak hour delays. For example, at the intersection of Alessandro Boulevard and Cannon Road, the implementation of these measures is projected to reduce the morning peak hour delay from 197.3 seconds to 152.9 seconds.

Limiting certain driveways to tenant use only is part of a broader strategy to manage vehicle access. This change is expected to slightly redistribute traffic to other access points but will not significantly increase VMT. The Project's overall design, which includes walkways and bicycle paths, aims to encourage non-vehicular travel, thereby reducing local vehicle trips and associated VMT.

The DEIR provides data and analysis showing that the Project's location, mixed-use design, and proximity to public transit contribute to reducing VMT. The enhanced pedestrian and bicycle infrastructure, combined with the strategic placement of amenities within walking distance, are key factors in achieving this reduction. The overall reduction in local vehicle trips and VMT is supported by the Project's alignment with sustainable urban planning principles, which prioritize walkability and access to public transportation.

The improvements proposed by the Project owner and the City are designed to reduce traffic delays and VMT. The DEIR and its appendices contain detailed data and analysis supporting the reduction in peak hour delays and the anticipated decrease in local vehicle trips. The Project's design, which includes limitations on certain driveways and enhanced pedestrian infrastructure, contributes to these reductions by promoting alternative transportation modes.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.76:**

The commenter expresses concerns that limiting driveways to tenant only would not reduce VMTs and requests an explanation. The DEIR outlines that the Project includes paved sidewalks and marked crosswalks throughout the site, designed to connect with existing public paths along Mission Grove Parkway South and Mission Village Drive. This design aims to enhance walkability and bike-ability, thereby reducing local vehicle trips and associated Vehicle Miles Traveled (VMT).

While certain driveways and sidewalks will be limited to tenant use only, the overall connectivity for pedestrians and cyclists is maintained. The primary goal is to ensure that residents can easily access the surrounding shopping centers and amenities without relying on cars, thus promoting alternative modes of transportation.

The data supporting the reduction in local vehicle trips and VMT is provided in the appended Traffic Operation Analysis and VMT (Appendix I) and is based on the design principles of enhancing non-vehicular connectivity. By creating a network of pedestrian and bicycle pathways



that link the residential areas with nearby commercial and retail establishments, the Project encourages residents to walk or bike rather than drive. This approach is consistent with sustainable urban planning practices that aim to reduce traffic congestion and emissions.

The DEIR provides analysis showing that improved walkability and bike-ability directly contribute to reduced vehicle trips. This reduction is achieved by making it convenient and safe for residents to travel on foot or by bicycle for short trips, thus decreasing the need for car use.

The Project's design, including limited access driveways and comprehensive pedestrian and bicycle infrastructure, supports a reduction in local vehicle trips and VMT. The DEIR's analysis confirms that these measures will enhance connectivity and promote non-vehicular travel, contributing to the Project's sustainability goals.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.77:**

The commenter questions the why and how the vehicular gates will be installed and if they would make the Project look like a prison or jail. The commentator's questions related to vehicular gates are not issues that are required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The Project includes the installation of vehicular gates to control access to the residential area. These gates are designed to enhance security and ensure that only residents and authorized personnel can access certain parts of the development. The Project site's design is discussed in Section 3.0 Project Description (pp. 3.0-6 - 3.0-23).

The primary purpose of the vehicular gates is to provide a secure living environment for residents. This is a common feature in many residential developments, including those without Homeowners Associations (HOAs), and nearby neighborhoods of Mission Villas Apartments and Mission Grove Park, both located immediately adjacent to the shopping center. The gates will be designed to blend aesthetically with the overall architecture of the Project, ensuring they do not detract from the appearance of the development.

The design intent is to integrate the gates in a way that maintains the Project's residential and welcoming atmosphere. The gates will be complemented by landscaping and architectural elements that enhance the visual appeal of the entrance points, mitigating any negative perceptions.

The vehicular gates are a security feature intended to provide a safe environment for residents, similar to those found in many other residential communities. Their design will be carefully considered to ensure they contribute positively to the overall aesthetic of the Project and do not give an impression of a restrictive or unwelcoming environment.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does

not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.78:**

The commenter requests information on shared parking. The commenter's question related to information on shared parking is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The Project design includes elements intended to balance the need for security and the benefits of shared amenities. While certain areas of the Project will have restricted access for residents only, shared parking spaces and other public access points are incorporated to serve both residents and the surrounding community.

The Project includes shared parking spaces to support both the residential units and the adjacent retail and commercial areas, as discussed in Section 3.0 Project Description (pp. 3.0-16 - 3.0-17). These shared parking spaces are intended to facilitate the efficient use of available parking and support local businesses by providing convenient access for customers. This shared parking is located outside of the gated apartment development, and would be accessible to the public.

While some parts of the Project, such as specific driveways, will be gated for resident access only, other areas will remain accessible to the public. This design approach ensures that residents have secure areas while maintaining connectivity and access for the broader community.

The Project design strikes a balance between ensuring resident security and providing shared amenities like parking spaces. Restricted access in certain areas is complemented by shared parking and other public access points, maintaining the Project's integration with the surrounding community.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.79:**

The commenter requests more information on the Riverside Transit Authority's (RTA) ridership and the need to relocate the bus stop. The commenter's request related to RTA ridership and the bus stop relocation is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The decision to relocate the existing bus stop approximately 200 feet north of its current location was made based on coordination with the Riverside Transit Agency (RTA) and is discussed in detail in Section 5.17 Transportation (p. 5.17-8), and in the Transportation Operation Analysis (Appendix I). This relocation is intended to enhance pedestrian connectivity and improve access to public transit for both the proposed Project site and the existing commercial and retail areas.

The relocation of the bus stop is part of the Project's broader design features aimed at improving pedestrian connectivity. By positioning the bus stop closer to key pedestrian pathways within the Project, it ensures that residents have convenient access to public transit, thereby promoting the use of sustainable transportation options.

The relocation of the bus stop, based on coordination with RTA and supported by ridership data, is designed to enhance pedestrian connectivity and access to public transit. This strategic move supports the Project's goal of integrating with the existing transportation infrastructure and promoting non-vehicular travel.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.80:**

The commenter expresses concerns regarding the project's proposed height and the impact it would have on airspace. The DEIR addresses potential impacts of the Project's building height on airspace use. The Project's maximum building height of 57.2 feet has been evaluated in the context of Federal Aviation Administration (FAA) regulations and the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP), discussed in Section 5.9 Hazards and Hazardous Materials (pp. 5.9-2 – 5.9-7).

The Project's building height has been analyzed to ensure compliance with FAA Part 77 regulations, which set standards for objects affecting navigable airspace. The DEIR confirms that the Project's height is below the FAA threshold requiring an Obstruction Evaluation/Airport Airspace Analysis (OE/AAA), meaning it does not pose a significant risk to air navigation.

Given that the Project's height complies with FAA regulations and is below the critical elevation thresholds, it is not expected to interfere with private plane flights or police helicopter operations in the area. The DEIR's analysis ensures that the proposed building heights will not create hazards or obstructions in the navigable airspace.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.81:**

The commenter requests the definition of "non-residential". The commenter's request related to definition of "non-residential" is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

In the context of the DEIR and Compatibility Zone C2, "non-residential" refers to uses that are not intended for housing, such as commercial, industrial, or other uses that typically involve offices, retail spaces, and recreational facilities. This designation is important for determining land use compatibility and intensity requirements within specific zones.

Compatibility Zone C2 has specific limits on both residential and non-residential intensities to ensure safety and compatibility with airport operations, discussed in Section 5.9 Hazards and Hazardous Materials (pp 5.9-5 – 5.9-7). The non-residential average intensity for this zone is

limited to 200 people per acre. This limit applies to commercial or other non-housing uses that may generate significant foot traffic or occupancy levels.

The Mission Grove Apartments Project is primarily a residential development with additional non-residential amenities such as leasing office areas, pool areas, club areas, and fitness facilities. These non-residential components contribute to the overall intensity calculations. However, the Project's total occupancy, including both residential and non-residential uses, results in an average intensity of 31 people per acre, which is significantly below the maximum allowed non-residential intensity of 200 people per acre for Compatibility Zone C2.

In Compatibility Zone C2, non-residential refers to commercial and other non-housing uses. The Project, while primarily residential, includes non-residential amenities that contribute to its intensity calculations. The total intensity of 31 people per acre is well within the limits set for both residential and non-residential uses in Compatibility Zone C2, ensuring compliance with the applicable regulations.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.82:**

The commenter asks about unauthorized parking and if the shopping center has agreed to be used by Project tenants. The commenter's questions related to parking management is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, please refer to Table 2.2-13: Topical Response to Comments.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.83:**

The commenter questions if the DEIR considers different types of transportation. The commenter's question related to electric bikes or skateboards is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The Project design has incorporated elements to support various types of transportation, including electric bikes and skateboards, as part of its commitment to promoting sustainable and diverse transportation options.

The Project includes designated areas for bicycle parking and storage racks. The inclusion of these facilities, discussed in Section 5.17 Transportation (p. 5.17-2), encourages residents to use alternative transportation modes, reducing reliance on cars and promoting a more environmentally friendly lifestyle.

In addition to traditional bike paths, the Project's walkways and pathways are designed to be wide and accessible, supporting the use of skateboards and electric scooters. These pathways connect

seamlessly with existing public paths, enhancing overall connectivity and encouraging the use of various non-vehicular transportation options.

The Project has considered and incorporated infrastructure to support alternative transportation modes, including electric bikes and skateboards. These measures are designed to promote sustainable transportation and reduce reliance on automobiles.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.84:**

The commenter requests the definition of "high quality residential" and expresses concerns about future changes to ownership and the Project. The commenter's questions are not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

A "high quality residential development" refers to a project that meets or exceeds established standards in design, construction, amenities, and environmental sustainability. This includes the use of durable materials, efficient and modern building practices, comprehensive landscaping, and the provision of facilities and services that enhance residents' quality of life.

The Project owner may decide to sell the completed development to a different company. Such a change in ownership does not inherently require City approval unless stipulated by specific agreements or conditions of approval. However, any new owner must adhere to all existing commitments, contractual obligations, and regulatory requirements associated with the Project.

The City ensures that contractual requirements and building standards are honored through a combination of regulatory oversight, inspections, and enforcement mechanisms. The Project must comply with all approved plans, mitigation measures, and conditions set forth during the approval process, regardless of any changes in ownership. Additionally, performance bonds or other financial securities may be required to guarantee the completion of required improvements.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.85:**

The commenter's comment and/or question related to subletting is not an issue that is required to be discussed or analyzed pursuant to CEQA. The comment and accompanying questions provided do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As the comment/questions do not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does they reflect on the adequacy or content of the DEIR, they are deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall

respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.86:**

Please refer to Table 2.2-7: Topical Response to Comments.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.87:**

The commenter’s comment and/or question related to property management and definition of community and infrastructure connections is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. As discussed under section 5.17 Transportation (p. 5.17-18) the property would be under care and maintenance of a leasing office or property management staff selected by the property owner. The management, rent, and selling of units would be under the discretion of the property management and ownership. As stated within the DEIR “The Project will create community and infrastructure connections by creating a mixed-use environment encouraging walkability and an urban setting, and by providing a high-quality residential development in close proximity to many amenities and transit corridors” (p. 5.11-30).

The comment and accompanying questions provided do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As the comment/questions do not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does they reflect on the adequacy or content of the DEIR, they are deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.88:**

The commentor’s comment and/or question related to multi-family residential is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The City of Riverside Municipal Code defines multi-family as “a building, or portion thereof, designed for occupancy by two or more families living independently of each other and containing two or more dwelling units” and single-family as “a dwelling designed for occupancy by one family and located on one lot”

[https://library.municode.com/ca/riverside/codes/code\\_of\\_ordinances?nodeId=PTIICOOR\\_TIT1\\_9ZO\\_ARTXDE\\_CH19.910DE\\_19.910.050DDE](https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT1_9ZO_ARTXDE_CH19.910DE_19.910.050DDE)).

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.89:**

The commenter incorrectly states that a gym is not within the existing Mission Grove Shopping Center area. The DEIR is citing the existing LA Fitness (19531 Mission Village Dr, Riverside, CA 92508) located approximately 900 feet to the southeast of the Project area.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.90:**

Please refer to Response 4.16.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.91:**

Please refer to Table 2.2-13: Topical Response to Comments.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.92:**

The commenter incorrectly states that the inconsistency findings of the Project by the RCALUC cannot be reviewed by the public or other agencies before the city of Riverside officially begins to consider the Mission Groves Apartment Project. The finding of inconsistency is and has been available for public review. Additionally, the DEIR document containing detailed language and explanation of the inconsistency was submitted for a public comment period via Notice of Availability on May 10th, 2024, through June 24th, 2024, whereupon the DEIR was made widely available to the public and interested parties and agencies.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.93:**

The commenter expresses concerns regarding compliance with the Mission Grove Specific Plan. DEIR Section 5.11 Land Use and Planning details that the proposed Project is inconsistent with policies within the Mission Grove Specific Plan, hence the inclusion of a Specific Plan Amendment (SPA) to revise it as part of this proposed Project (p. 5.11-54). The City is required to review all projects submitted by property owners with a complete application that have paid all applicable fees and process it to City Council to be voted on. This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.94:**

The commenter expresses concerns regarding interior noise levels. Please refer to DEIR Section 5.13 Noise (p. 5.13-1) for the discussion and analysis of the proposed Project's potential noise impacts. Indoor noise is analyzed on p. 5.13-21, and in a windows and doors closed condition, indoor noise levels will not exceed the interior noise standard of 45 dBA CNEL with standard construction techniques. Table 5.13-10 notes that standard construction in California takes into account the warm climate. Further, the Project will include HVAC equipment for all residential units on site, allowing windows and doors to remain closed for prolonged periods of time. As discussed in DEIR Section 5.13.6 Proposed Mitigation Measures (p. 5.13-25), the proposed Project would not exceed any of the noise thresholds of significance; nonetheless, the proposed Project would implement mitigation measures related to construction noise in the Mission Grove Specific Plan in addition to the mitigation measures related to aircraft noise in the Mission Grove Specific Plan. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.95:**

The commenter requests the noise study. The proposed Project's Noise and Vibration Impact Analysis (DEIR Appendix H) is available on the City's Development Projects and CEQA Documents webpage, under the Projects in Process section. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.96:**

The commenter questions if tenant cars will be effectively integrated and if public access will not be impaired. The Project is effectively integrated with the existing streets and pedestrian network by incorporating design features that enhance connectivity and promote walkability. Additionally, the traffic analysis includes a VMT assessment, utilizing the City of Riverside's Traffic Impact Analysis (TIA) Guidelines, which require that the addition of Project traffic does not degrade LOS



below acceptable levels. The Project's VMT impact was analyzed for weekday peak hours, taking into account various factors like trip generation, distribution, and assignment (Appendix I).

The Project would also be responsible for fees including the Western Riverside County Transportation Uniform Mitigation Fee (TUMF), which is an impact fee program that funds transportation improvements associated with new growth (p. 5.17-4 – 5.17-5), and the City's Development Impact Fee (DIF), which is a program that funds a variety of public transportation facilities, namely traffic and railroad signs and transportation for dwelling and mobile units.

Furthermore, a variety of Transportation Demand Management (TDM) strategies are being put in place to help alleviate VMT impacts. These measures include improving access to public transit, enhancing pedestrian and bicycle pathways, and promoting alternative transportation modes such as carpooling and electric vehicles by incorporating EV charging stations.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.97:**

The commenter questions how the Project preserves open spaces and protects native plants. As discussed in DEIR Section 3.2 Existing Site Characteristics (p. 3.0-5), the proposed Project would be constructed on the site of an existing, vacant retail building and associated previously developed surface parking lot. The design of the proposed Project as an infill development aligns with one of the Project's objectives to use land resources more efficiently by providing a well-planned infill development on an underutilized vacant site, rather than developing a currently undeveloped open space site within the City (See DEIR Section 3.4 Project Objectives p. 3.0-2). Thus, the proposed Project does contribute to accomplishing applicable General Plan 2025 Open Space and Conservation Elements listed in DEIR Section 5.16.2.3 Local Regulations (p. 5.16-2) as the proposed Project would not occur within, divide, or disrupt existing open spaces within the City. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.98:**

Please refer to Response 4.40.

The commenter raises concerns regarding the Project's proposed solar power. DEIR Section 5.6 Energy (p. 5.6-1), discusses the types of renewable energy the proposed Project would incorporate, including photovoltaic solar power. Additionally discussed in DEIR Section 5.6 is the proposed Project's requirement to comply with all applicable Title 24 building standards, including those regarding the implementation of photovoltaic/solar energy.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does

not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.99:**

The commenter requests access to the 'Will Serve Letter' from WMWD. The proposed Project's WMWD 'Will Serve Letter' will be included as additional EIR Appendix L. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.100:**

The commenter expresses concern for the UMWP report dating back to 2020. Reports referenced in the DEIR were the most currently available at the time of the DEIR's preparation and were updated as applicable if/when any more current reports were made available. Urban Water Management Plans (UWMPs) are prepared by urban water suppliers every five years pursuant to California law (Water Code § 10621). These plans support the suppliers' long-term resource planning to ensure that adequate water supplies are available to meet existing and future water needs. WMWD's 2020 UWMP includes a Water Reliability Assessment to compare the total water supply sources available to long-term projected water use over the next 25 years, in five-year increments, for a normal water year, a single dry water year, and a drought lasting five consecutive water years. WMWD Wholesale expects to have sufficient supplies available to meet the demands of Western Retail and its other wholesale customers, even in dry years, based on Metropolitan's 2020 UWMP (see Section 5.19 Utilities and Service Systems). (p. 5.11-47.)

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.101:**

The commenter expresses concerns for the Project not funding fair share costs. Please see DEIR Table 5.11-1 – Consistency with Applicable General Plan Policies, which states under Policy CCM-2.3 that the proposed Project would "pay its fair share of the cost required to offset operational deficiencies" (p. 5.11-18 – 5.11-19). Additionally, the DEIR contains several sections identifying applicable fees the proposed Project would be subject to as well as what the particular fees fund, including:

DEIR Section 5.15.2.2 State Regulations (p. 5.15-3), which explains that California Government Code 66000 allows a qualified agency, such as a local school district, the ability to impose fees on developers to compensate for the impact a project will have on existing facilities or services (p. 5.15-3). This DEIR section additionally explains California Government Code 65995, which sets base limits and additional provisions for school districts to levy development impact fees to help fund expanded facilities to house new pupils that may be generated by a development project.

DEIR Section 5.15.6 Environmental Impacts (p. 5.15-7) – Threshold A, which explains that Riverside Municipal Code (RMC) Chapter 16.52 – Development Fees for Fire Stations provides the City with the ability to collect development fees for the construction and purchase of land for fire stations and the acquisition of equipment and furnishings to equip fire stations.

DEIR Section 5.17.2.2 Regional Regulations, which discusses the Western Riverside County Transportation Uniform Mitigation Fee (TUMF), which is an impact fee program that funds transportation improvements associated with new growth (p. 5.17-4 – 5.17-5). This DEIR section additionally discusses the City's Development Impact Fee (DIF), which is a program that funds a variety of public transportation facilities, namely traffic and railroad signs and transportation for dwelling and mobile units.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.102:**

. The commenter's comment and/or question related to internet and cell phone service is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The proposed Project is not anticipated to interfere with access to or usage of the aforementioned types of communication as it is typical for individuals to access Wi-Fi services and cell phone services from third-party providers who would be independent of the proposed Project. Wi-Fi and internet services are typically provided via satellite or cable to individual units, thus building height would not be a factor that affects them. Additionally, DEIR Section 5.1.3 Project Design Considerations (pp. 5.1-5 – 5.1-7) shows that the proposed Project's maximum building height would be 57 feet and 2 inches (57'2"), which is below the City's Site Development Standard maximum building height of 60 feet (60'). This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.103:**

The commenter expresses concerns for local police force's ability to handle an increased population. Please see DEIR Section 5.15.6 Environmental Impacts, under Threshold A – Police Protection (p. 5.15-8). This section discusses that there would be sufficient police protection service and facilities to accommodate the additional population resulting from the proposed Project. This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.104:**

Please see DEIR Section 5.11 Land Use and Planning, subsection *Consistency with General Plan Policies* (p. 5.11-53), which discusses that while the proposed Project's 35.0 dwelling units per acre would exceed the maximum permitted density of 6.0 dwelling units per acre within Zone C2, the Project would not exceed the non-residential average criteria (limited to 200 people per acre) or single-acre intensity criteria (limited to 500 people per acre). The Project also does not include any proposed variances or waivers from any code standards.

Additionally, the commenter questions why the City and local residents should agree to the proposed Project. Please refer to Response 4.16. This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 4.105:**

Please see Response 4.104 as comment 4.105 is a repeat of comment 4.104.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.106:**

The commenter questions what the nearest runway refers to. Please see Section 5.11 Land Use and Planning, subsection "Height" (p. 5.11-59). As discussed, the proposed Project is at a distance of approximately 17,464 feet from the nearest point of Runway 14-32. At this distance, the proposed Project would require Federal Aviation Administration (FAA) review if the top roof of the Project exceeded 1,710 feet above mean sea level (amsl). As further discussed, the proposed Project's finished floor elevation is 1,595 feet amsl, with a top point elevation of 1,652 feet, 2 inches amsl. Therefore, the proposed Project does not require FAA review and would not result in impacts related to applicable FAA regulations. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.107:**

Please see Response 4.104 as comment 4.107 is a repeat of comment 4.104.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.108:**

The commenter questions the definition of "occupants of the property." The commenter's comment and/or question related to defining occupants is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

“Occupants of the property” includes both tenants in residential units and employees. The comment and accompanying questions provided do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As the comment/questions do not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does they reflect on the adequacy or content of the DEIR, they are deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.109:**

Please refer to Response 4.104 as comment 4.109 is a repeat of comment 4.104.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.110:**

The commenter expresses concern over definitions of several noise level terminologies. Please see DEIR Table 5.11-1 – Consistency with Applicable General Plan Policies (p. 5.11-42), which discusses the proposed Project’s consistency with General Plan 2025 Objective N-4. Additionally, please see DEIR Section 5.13.2.3 Local Regulations, under subsection Land Use Compatibility (p. 5.13-11), which discusses the noise levels associated with the terms, “conditionally acceptable,” “normally acceptable,” etc. Additionally, as discussed in DEIR Section 5.13.6 Proposed Mitigation Measures (p. 5.13-25), the proposed Project would not exceed any of the noise thresholds of significance; nonetheless, the proposed Project would implement mitigation measures related to construction noise in the Mission Grove Specific Plan in addition to the mitigation measures related to aircraft noise in the Mission Grove Specific Plan. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.111:**

The commenter questions what noise insulation features are included in the Project to bring the noise to an acceptable level. Please refer to DEIR Section 5.13 Noise for a discussion and analysis of the proposed Project’s potential noise impacts, including traffic-related noise. As discussed in DEIR Section 5.13.6, the proposed Project would not exceed any of the noise thresholds of significance and no further analysis is required. Notably, the analysis shows that the proposed Project would result in a project-related traffic noise increase of up to 0.6 dBA in the project vicinity. This noise level increase is below 3 dBA and would not be perceptible to the

human ear in an outdoor environment. (p. 5.13-18.) The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.112:**

The commenter questions what noise insulation features are included in the Project to bring the noise to an acceptable level. As discussed in DEIR Section 5.13.3 Project Design Considerations through DEIR Section 5.13.6 Proposed Mitigation Measures (pp. 5.13-15 – 5.13-25), the proposed Project would comply with the State's noise insulation standards as codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Code (please refer to these California Code of Regulations sections for more information on types of noise insulation). The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.113:**

The commenter questions the qualifications of the noise consultant. Please refer to DEIR Appendix H Noise and Vibration Impact Analysis, which was prepared by LSA Associates, Inc., an environmental consulting firm since 1976, and whose team includes noise and vibration experts to provide the comprehensive acoustical assessments necessary to comply with CEQA/NEPA. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.114:**

The commenter's comment and/or question related to air conditioning/heating/ventilation units is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. Per the Project's architect, there will be an AC unit placed in each residential unit. The comment and accompanying questions provided do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As the comment/questions do not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does they reflect on the adequacy or content of the DEIR, they are deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.115:**

The commenter questions if double-paned windows are included in the Project. Window specifications are not necessary to determine interior noise levels with the windows closed as

exterior-to-interior noise reduction is based on the United States Environmental Protection Agency's (EPA) Protective Noise Levels and standard construction in California with a combination of exterior walls, doors, and windows (Appendix H). Noise levels have been provided for if the windows remain open. Window specifications are not decided until later construction phases. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.116:**

The commenter questions why "long term ground borne noise" was not included. As discussed in DEIR Section 5.13.1 Setting, under Fundamentals of Vibration (p. 5.13-4), vibration refers to ground-borne noise and perceptible motion. Additionally, DEIR Section 5.13.5 Environmental Impacts, Threshold B (p. 5.13-22 – 5.13-24) analyzes if the proposed Project would result in the generation of excessive ground borne vibration or ground-borne noise levels and concludes the proposed Project would not exceed any of the noise thresholds of significance. Thus, the DEIR has in fact discussed ground-borne noise, including long-term ground-borne noise (p. 5.13-24). Further, DEIR Section 5.13 Noise Threshold A notes that both short-term and long-term noise impacts would be less than significant and comply with applicable standards (pp. 5.13-16 – 5.13-21).

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.117:**

The commenter asks "what other long term and planned development" is included in the DEIR. As discussed in DEIR Section 4.3 Developments Considered in Cumulative Impact Analysis (p. 4.0-1 – 4.0-3), currently planned and pending projects in Riverside and surrounding areas are included in DEIR Table 4.0-1. The methodology for selecting cumulative projects to include in the analysis is based on identifying reasonably foreseeable future projects that could contribute to environmental impacts in conjunction with the proposed Project. This involves reviewing local planning documents, development applications, and information from relevant agencies to determine which projects are geographically and temporarily related to the Project. The analysis focuses on projects that are close enough in timing and proximity to have the potential for overlapping impacts. The DEIR considers these cumulative projects to ensure a comprehensive evaluation of combined impacts. The Project's impacts will remain consistent with the findings of the DEIR. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.118:**

The commenter questions which job center and institution are resulting from the proposed Project. As outlined in Response 4.64, the applicant anticipates the Project will have approximately 3 full time employees (2 leasing agents and 1 maintenance) and 7 part time employees (4 landscape and 3) maintenance. Although the Project will generate a few jobs, it is not considered a new job center.

The Project is consistent with several policies from the City's General Plan 2025, including AQ-1.5 and AQ-1.6. It is important to note that for the Project to be consistent with the General Plan policies, it is not required that it meet every single aspect of each policy. Rather, consistency is determined based on the Project's alignment with overall goals and intents of the policies. However, the Project would consist of an infill development located within close proximity to various commercial and retail businesses. Additionally, the Project would create jobs during both construction and operation. The Project would generate temporary employment opportunities during construction and the operations (on-site leasing office) and maintenance of the development (cleaning and landscape maintenance of the on-site amenities) would generate new employment opportunities (p. 6.0-10). The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.119:**

The commenter questions the Project's inclusion of measures to discourage automobile dependency. A number of sections through the DEIR, including DEIR Section 3.0 Project Description (p. 3.0-1), Section 5.3 Air Quality (p. 5.3-1), Section 5.6 Energy (p. 5.6-1), Section 5.8 Greenhouse Gas Emissions (beginning on DEIR p. 5.8-1), and Section 5.17 Transportation (p. 5.17-1) discuss the various proposed Project design elements and features which would work towards reducing automobile dependency, such as via individual vehicle trips, and associated vehicle miles traveled. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.120:**

The commenter expresses concern regarding population growth in the Mission Grove area. As discussed in DEIR Section 5.11.1 Setting – Current Land Use and Zoning (pp. 5.11-1 – 5.11-2), the proposed Project includes a Specific Plan Amendment (SPA) to the Mission Grove Specific Plan. This SPA would introduce residential land use and provides for specific design guidelines integrating land uses. As further discussed in this DEIR section, to date, the Mission Grove Specific Plan has been amended 11 times and the adopted amendments significantly reduced the initially proposed industrial acreage proposed in the Specific Plan and has more than doubled the number of allowable dwelling units to 2,300, per the City's General Plan 2025. Thus, as the proposed Project would be subject to similar SPA reviews and approvals and as the Specific Plan has a history of adopted amendments to allow for additional dwelling units within the Mission



Grove neighborhood area, it is not anticipated the proposed Project would result in significant impacts to the Mission Grove population. Additionally, DEIR Section 5.14 Population and Housing discusses how the incremental increase in population would have a less than significant impact (p. 5.14-4). The proposed Project is growth-accommodating by providing much-needed housing options in a well-planned, mixed-use environment that supports the City's growing population, aligns with future housing demand, and integrates with nearby commercial services and transit corridors to reduce urban sprawl and promote sustainable development. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.121:**

The commenter questions how the proposed Project would impact school enrollment and what transportation methods would be made available to children attending school. Fees paid by the developer would be used to offset the impact of the number of new students generated by the Project and would ensure that the development contributes to a fair-share amount to help maintain adequate school facilities and levels of service. Therefore, the provision of schools is the responsibility of the school district. Senate Bill 50 provides that the statutory fees found in the Government and Education Codes are the exclusive means of considering and mitigating for school impacts. Imposition of the statutory fees constitutes full and complete mitigation. (p. 5.15-9.) The Riverside Unified School District has a Pupil Transportation Plan available online that details which students are eligible for home-to-school transportation services, which would apply to students residing in the Mission Grove area that are attending schools in this district ([https://www.riversideunified.org/important\\_information/pupil\\_transportation\\_plan](https://www.riversideunified.org/important_information/pupil_transportation_plan)). DEIR Section 5.15.2.2 State Regulations, which explains that California Government Code 66000 allows a qualified agency, such as a local school district, the ability to impose fees on developers to compensate for the impact a project will have on existing facilities or services (p. 5.15-3). This DEIR section additionally explains California Government Code 65995, which sets base limits and additional provisions for school districts to levy development impact fees to help fund expanded facilities to house new pupils that may be generated by a development project. The comment and accompanying questions provided do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As the comment/questions do not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does they reflect on the adequacy or content of the DEIR, they are deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.122:**

The commenter questions planned access and the RFD's ability to service the proposed Project. The project design includes elevators to ensure accessibility for all residents and would be compliant with the City of Riverside Fire Department requirements, including large enough to accommodate a gurney for use by emergency personnel (p. 5.7-9). As discussed in DEIR Section 5.15.1 Setting (p. 5.15-1), the Riverside Fire Department (RFD) is an all-hazard emergency service agency, providing fire protection, emergency medical services, fire safety inspections, community education, and emergency preparedness planning and training for the City. It is anticipated that the combination of RFD's fire safety inspections, emergency preparedness planning, and the requirement of the proposed Project to be constructed in accordance with ADA and California Building Code standards, RFD would be equipped and prepared to address emergency situations throughout the proposed Project site. The Project would be constructed in accordance with current building and fire/life/safety ordinances and codes, including all applicable RMC code requirements related to construction, access, water mains, fire flows, and hydrants. (p. 5.15-8.) Additionally, as discussed in DEIR Section 5.9.6 Environmental Impacts before Mitigation, under Threshold F (p. 5.9-24), the proposed Project would not impair the implementation of or physically interfere with an emergency response or evacuation plan. The Project has been reviewed to ensure that it adequately meets the specific needs of the Mission Grove area, as nearby fire stations and response times have been determined to be sufficient and to meet local standards. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.123:**

The commenter's comment and/or question related to property taxes is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. The comment and accompanying questions provided do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As the comment/questions do not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does they reflect on the adequacy or content of the DEIR, they are deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.124:**

The commenter questions what fees would be paid to the developer. The DEIR contains several sections identifying applicable fees the proposed Project would be subject to as well as what the particular fees fund, including:

DEIR Section 5.15.2.2 State Regulations, which explains that California Government Code 66000 allows a qualified agency, such as a local school district, the ability to impose fees on developers to compensate for the impact a project will have on existing facilities or services (p. 5.15-3). This

DEIR section additionally explains California Government Code 65995, which sets base limits and additional provisions for school districts to levy development impact fees to help fund expanded facilities to house new pupils that may be generated by a development project.

DEIR Section 5.15.6 Environmental Impacts – Threshold A, which explains that Riverside Municipal Code (RMC) Chapter 16.52 – Development Fees for Fire Stations provides the City with the ability to collect development fees for the construction and purchase of land for fire stations and the acquisition of equipment and furnishings to equip fire stations (p. 5.15-7).

DEIR Section 5.17.2.2 Regional Regulations, which discusses the Western Riverside County Transportation Uniform Mitigation Fee (TUMF), which is an impact fee program that funds transportation improvements associated with new growth (p. 5.17-4 – 5.17-5). This DEIR section additionally discusses the City’s Development Impact Fee (DIF), which is a program that funds a variety of public transportation facilities, namely traffic and railroad signs and transportation for dwelling and mobile units.

As shown, each fee applicable to the proposed Project serves the purpose of addressing/mitigating for specific impacts resulting from the proposed Project, including within the local community in which the development would occur. The commenter may contact the City with any questions regarding specific fee payment amounts. Note that these fees are not paid “to the developer,” rather by the developer.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.125:**

The commenter asks how the project will contribute to objectives regarding open space. As discussed in DEIR Section 3.2 Existing Site Characteristics (p. 3.0-5), the proposed Project would be constructed on the site of an existing, vacant retail building and associated previously developed surface parking lot. The design of the proposed Project as an infill development aligns with one of the Project’s objectives to use land resources more efficiently by providing a well-planned infill development on an underutilized vacant site, rather than developing a currently undeveloped open space site within the City (See DEIR Section 3.4 Project Objectives p. 3.0-2). Thus, the proposed Project does contribute to accomplishing applicable General Plan 2025 Open Space and Conservation Elements listed in DEIR Section 5.16.2.3 Local Regulations as the proposed Project would not occur within, divide, or disrupt existing open spaces within the City. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.126:**

The commenter questions if impacts will change if the actual resident count exceeds the 829 estimate. Due to the proposed Project’s number of dwelling units, it is not anticipated the number

of residents would greatly exceed the estimated 829 persons occupying the site. The estimated number of residents is a reasonable estimate and based on the following breakdown:

Unit Type	# of Units	Average Residents per Unit	Total Residents
One Bedroom Studio	24	1.5	36
One Bedroom	133	1.7	226.1
One Bedroom + Den	39	1.9	74.1
Two Bedroom	141	3.1	437.1
Three Bedroom	10	5.5	55
Total	347		828.3

There is no industry standard for estimating the number of residents in an apartment development. No substantial evidence provided by the commenter to show fault with EIR's approach. An assumption that the actual Project's number of residents would greatly exceed what was estimated and used in the EIR speculative.

Additionally, as discussed in DEIR Section 6.4.1 Population Growth (p. 6.0-9), the estimated 829 proposed Project residents would be approximately 0.2 percent of the maximum population growth anticipated in the City's General Plan EIR for 2025. Therefore, it is anticipated that an incremental increase beyond the projected 829 residents would not result in significant impacts to population growth. The proposed Project is growth-accommodating by providing much-needed housing options in a well-planned, mixed-use environment that supports the City's growing population, aligns with future housing demand, and integrates with nearby commercial services and transit corridors to reduce urban sprawl and promote sustainable development.

Additionally, the City has established city-wide recreational policies, goals, and regulations that apply to all developments within its boundaries, including Mission Grove. By evaluating the Project's compliance with the City's overall recreational standards, such as parkland requirements and access to recreational facilities, the DEIR ensures that the Project aligns with local regulations designed to benefit all areas of the City, including Mission Grove.

Furthermore, discussing the City's recreational infrastructure as a whole allows for a comprehensive assessment of how the Project fits into the larger network of parks and recreational facilities, ensuring that it supports city-wide recreational objectives and policies. The Project complies with these established city-wide standards, and this broader analysis ensures that the Mission Grove area is adequately addressed through consistent application of municipal regulations.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does

not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.127:**

Please refer to Response 4.124.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.128:**

The commenter expresses concerns over increased traffic due to the proposed Project. The proposed Project's Traffic Operation Analysis and VMT appendices can be accessed and viewed on the City's Development Projects and CEQA Documents webpage, under the Projects in Progress section. Additionally, DEIR Section 5.17 Transportation (p. 5.17-1) provides an analysis of the proposed Project's potential transportation and VMT-related impacts, how these impacts were assessed, and what feasible, applicable mitigation measures may be implemented to minimize potential impacts. The Project's Traffic Operations Analysis and VMT analysis (Appendix I) were prepared in accordance with the City of Riverside's Traffic Impact Analysis (TIA) Guidelines. The analysis considers various conditions: existing, opening year (2027), and cumulative conditions up to the year 2045, both with and without the Project. These assessments focus on intersection Levels of Service (LOS), roadway segment conditions, and queuing analysis. LOS was evaluated using the Highway Capacity Manual (HCM) methodologies, which analyze control delay and traffic flow at intersections and roadway segments. The criteria for LOS range from A (free-flowing traffic) to F (high levels of congestion). LOS D or better is the minimum acceptable threshold for most intersections in Riverside, with LOS C for lower-traffic intersections. The Project's VMT impact was analyzed for weekday peak hours, taking into account various factors like trip generation, distribution, and assignment.

Additionally, a variety of Transportation Demand Management (TDM) strategies are being put in place to help alleviate VMT impacts. These measures include improving access to public transit, enhancing pedestrian and bicycle pathways, and promoting alternative transportation modes such as carpooling and electric vehicles by incorporating EV charging stations. While these efforts may not fully eliminate the increase in VMT, they are intended to mitigate the impacts as effectively as possible.

The comment's additional questions provided pertain to the existing environment and City law enforcement rather than the scope of the proposed Project and do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As the comment/questions do not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does they reflect on the adequacy or content of the DEIR, they are deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained

in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.129:**

The commenter asks for the DEIR to cite Amazon studies. The commenter's comment and/or question related to Amazon studies is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided.

The proposed Project is a multifamily residential development and is not a warehouse/distribution center type of development as are most Amazon facilities. As noted in the DEIR, Project amenities such as parcel lockers and bicycle racks, are proposed as part of the Project's design. While these amenities were not specifically included in the Project's design for the purposes of VMT reduction, the inclusion of these Project design considerations may aid in reducing Project-generated VMT. (pp. 5.17-8, 5.17-19 – 5.17-20.) Because these amenities are not specifically included to reduce VMT, and are not accounted for in potential VMT reduction measures, the DEIR presents a conservative assessment of VMT reductions and language such as "could, may, or should" is proper in describing potential VMT reduction due to these amenities. The comment and accompanying questions provided do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As the comment/questions do not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does they reflect on the adequacy or content of the DEIR, they are deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.130:**

The commenter expresses concerns regarding the traffic analysis's assessment of traffic patterns, pedestrian and bicyclist usage, and consideration of the vacancy of the property for 4 years. The proposed Project's Traffic Operation Analysis and VMT appendices can be accessed and viewed on the City's Development Projects and CEQA Documents webpage, under the Projects in Progress section. Additionally, DEIR Section 5.17 Transportation (p. 5.17-1) provides an analysis of the proposed Project's potential transportation and VMT-related impacts and how these impacts were assessed.

The Project's Traffic Operations Analysis and VMT analysis (Appendix I) were prepared in accordance with the City of Riverside's Traffic Impact Analysis (TIA) Guidelines. The analysis considers various conditions: existing, opening year (2027), and cumulative conditions up to the year 2045, both with and without the Project. These assessments focus on intersection LOS, roadway segment conditions, and queuing analysis. LOS was evaluated using the Highway Capacity Manual (HCM) methodologies, which analyze control delay and traffic flow at intersections and roadway segments. The criteria for LOS range from A (free-flowing traffic) to F (high levels of congestion). LOS D or better is the minimum acceptable threshold for most

intersections in Riverside, with LOS C for lower-traffic intersections. The Project's VMT impact was analyzed for weekday peak hours, taking into account various factors like trip generation, distribution, and assignment.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.131:**

The commenter asks if the City can provide the queuing analysis and the accuracy of the report. The proposed Project's Traffic Operation Analysis and VMT appendices can be accessed and viewed on the City's Development Projects and CEQA Documents webpage, under the Projects in Progress section. Section 8.0 of the Project's Traffic Operation Analysis contains the Queuing Analysis conducted for the proposed Project (Appendix I). The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.132:**

The commenter questions what additional improvements could be implemented if sufficient funds would be authorized. The commenter's comment and/or question related to additional improvements and funding is not an issue that is required to be discussed or analyzed pursuant to CEQA. The comment and accompanying questions provided do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As the comment/questions do not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does they reflect on the adequacy or content of the DEIR, they are deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.133:**

The commenter questions public pedestrian access and improvements not included in the DEIR. Proposed improvements associated with the proposed Project are discussed throughout the DEIR, including within Section 3.0 Project Description and within the Project Design Considerations sections within each CEQA topic analysis section. The public pedestrian path of travel is depicted in Figure 3.0-8 of the DEIR. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.134:**

The commenter expresses concerns regarding reports dating back to 2018. Although 2018 may seem like an older baseline year, it was selected as it reflects typical traffic patterns prior to the significant disruptions caused by the COVID-19 pandemic and the closure of the Kmart store on the Project site. More recent data, especially from the pandemic years, would likely show reduced traffic volumes due to stay-at-home orders, an increase in people working from home (telecommuting), and business closures, which would not represent normal conditions.

Using 2018 data results in a more conservative estimate of traffic impacts, ensuring that the VMT analysis accounts for higher traffic levels and does not underestimate future traffic. Additionally, 2018 was the most recent and reliable data available at the time of the analysis, ensuring that the study met the necessary standards for accuracy and relevance. Reports were updated as applicable as more current reports were made available. Additional reports are not required.

Additionally, it's important to note that the baseline conditions for the analysis are established as of the date of the NOP for the DEIR. In this case, the NOP was distributed on October 28<sup>th</sup>, 2022, and the existing conditions at that time were considered in determining the baseline. Since 2018 traffic data was the most reliable and available data at the time of the NOP, it was used to evaluate the Project's impacts accurately, in compliance with CEQA guidelines.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.135:**

The commenter questions compliance with regulations regarding the effectiveness of transportation measures implemented by the Project for VMT reduction. Please see DEIR Section 5.17.5 Environmental Impacts (p. 5.17-15 – 5.17-16). As discussed, the CAPCOA Measure T-18 – Provide Pedestrian Network Improvements methodology requires existing sidewalks in the project study area in addition to the sidewalks being provided by the project. Per the proposed Project's VMT Analysis, the proposed Project would add an additional approximately 0.57 mile of sidewalk/pedestrian access to existing public pedestrian paths of travel (p. 5.17-15). Per the analysis methodologies, the addition of this 0.57 mile of sidewalk/pedestrian access may reduce the proposed Project's VMT by approximately 0.14 percent.

Additionally, DEIR Section 5.17.5 Environmental Impacts discusses that when a lead agency identifies a significant CEQA impact, the agency must identify feasible mitigation measures in order to avoid or substantially reduce the impact (p. 5.17-14). Accordingly, the DEIR identifies strategies considered for potential mitigation of proposed Project VMT impacts. The DEIR (p. 5.17-14 – 5.17-21) describes these measures, the feasibility of implementing these measures for the proposed Project, and the approximate VMT reduction percentage associated with each measure considered.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does



not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.136:**

The commenter questions if the proposed Project would enable high speed internet usage for “work at home employees”

The Project will be equipped with modern infrastructure, which will enable access to high-speed internet for residents, supporting work-from-home employees (telecommuting). Given that high-speed internet is widely available across the City, it is fair to presume that this site will have the necessary connectivity to accommodate telecommuting, a practice that could contribute to VMT reduction.

As stated in the DEIR, while telecommuting and flexible work schedules can contribute to VMT reduction, this measure is typically implemented by employers as part of a commute trip reduction program and is therefore not directly applicable to a residential project like the Mission Grove Apartments. However, the Project will support telecommuting by ensuring the proper infrastructure is available. Additionally, Section 5.17.8 References provides the sources of information used in the preparation of the Transportation section of the DEIR, including resources for the proposed Project’s VMT discussion (pp. 5.17-4 – 5.17-5). The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.137:**

The commenter expresses concerns regarding VMT reduction calculations. As stated in DEIR Section 5.17.4 Thresholds of Significance, under the Threshold B discussion (pp. 5.17-17 – 5.17-18), while it is understood that the provision of electric charging stations might not reduce vehicle miles traveled (VMT), provision of electric charging stations would reduce greenhouse gas (GHG) emissions, which can be considered equivalent to a reduction in VMT. Further, the DEIR discusses that additional electric charging stations, in addition to CALGreen requirements, can be considered as a GHG/VMT mitigation measure, per CAPCOA. To meet the maximum GHG/VMT reduction, the DEIR estimates an additional 15 electric charging stations for the proposed Project would achieve the maximum allowable GHG/VMT reduction for the proposed Project of 11.9 percent. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.138:**

The commenter raises issues regarding VMT impacts and voting on the issue in City Council. While the DEIR has identified the Project’s transportation impacts as significant and unavoidable, it is important to note that the City and the developers are implementing mitigation measures to reduce these impacts to the extent feasible.

A variety of Transportation Demand Management (TDM) strategies are being put in place to help alleviate VMT impacts. These measures include improving access to public transit, enhancing pedestrian and bicycle pathways, and promoting alternative transportation modes such as carpooling and electric vehicles by incorporating EV charging stations. While these efforts may not fully eliminate the increase in VMT, they are intended to mitigate the impacts as effectively as possible.

The City's broader transportation goals also align with these mitigation efforts, focusing on reducing emissions, encouraging public transit use, and promoting sustainable urban growth. Although the VMT impacts are unavoidable, the Project includes thoughtful planning that integrates these strategies to support sustainable transportation options.

In terms of further public involvement, while the VMT issue cannot be individually voted on by City Council or as a separate public ballot item due to state-level CEQA regulations, the City ensures that all required public review processes and environmental evaluations are followed in compliance with state law. Any future proposals or initiatives to alter local policies related to transportation impacts must also adhere to CEQA requirements.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.139:**

The commenter asks how RFD will reach the top floors of the Project. As discussed in DEIR Section 5.15.1 Setting (p. 5.15-1), the Riverside Fire Department (RFD) is an all-hazard emergency service agency, providing fire protection, emergency medical services, fire safety inspections, community education, and emergency preparedness planning and training for the City. It is anticipated that the combination of RFD's fire safety inspections, emergency preparedness planning, and the requirement of the proposed Project to be constructed in accordance with ADA and California Building Code standards, RFD would be equipped and prepared to address emergency situations throughout the proposed Project site. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.140:**

The commenter questions the accuracy of the cumulative projects list and its use for VMT analysis. DEIR Section 4.3 Developments Considered in Cumulative Impact Analysis discusses how the cumulative project list included in DEIR Table 4.0-1 was developed in the Project's Focused Traffic Analysis (TIA) and created in consultation with the City of Riverside Planning and Public Works staff (pp. 4.0-1 – 4.0-4). The cumulative project list includes projects anticipated to contribute measurable traffic impacts to the study area, including the West Campus Upper Plateau project the commenter notes was previously placed on hold. As the West Campus Upper Plateau project has already been factored into the cumulative project analysis for the proposed

Project, whether the West Campus Upper Plateau project remains on hold or not would not result in a significant difference to the findings in the proposed Project's TIA. Therefore, no corrections or revisions to the proposed Project's vehicle miles traveled (VMT) analysis would be required. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.141:**

The commenter indicates they were not able to access/save/download the TIA Guidelines, TOA, and VMT analysis reports and inquires if copies of these documents can be made available for public review. The proposed Project's Notice of Availability of a DEIR indicates copies of the DEIR, which included all DEIR Appendices, had been made available for public viewing at a number of City facilities, including: the Riverside City Hall, Community & Economic Development Department; the Riverside Main Public Library; and the Riverside Public Library. The Notice of Availability additionally included information on whom to contact at the City if unable to access the electronic copy of the DEIR. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.142:**

Please refer to Response 4.2.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.143:**

The commenter states that the Western Municipal Water District (WMWD) Service Reliability Report does not note that WMWD supply from MWD will significantly increase in coming years and questions how this would affect the public from obtaining potable water in the near future. The DEIR has evaluated the available data, including projections for water supply and demand. The DEIR's analysis is based on WMWD's 2020 UWMP, which projects an increase in water supply from various sources, including groundwater and imported water. The UWMP anticipates that WMWD will meet the demands of its retail service area, including during dry and multiple dry years. These projections are based on long-term planning and water reliability assessments, as shown in the DEIR, with expected future supplies accounting for the continued growth in the region. As noted in the DEIR, in the 2020 UWMP, WMWD conducted a Water Reliability Assessment to compare the total water supply sources available to long-term projected water use over the next 25 years, in five-year increments, for a normal water year, a single dry water year, and a drought lasting five consecutive water years. WMWD also conducted a Drought Risk Assessment to evaluate a drought period that lasts five consecutive water years starting in 2021.

An analysis of both assessments determined that WMWD is reliable and anticipates meeting retail demands through local and imported water sources. WMWD Wholesale expects to have sufficient supplies available to meet the demands of Western Retail and its other wholesale customers, even in dry years, based on MWD's 2020 UWMP. (p. 5.19-8.)

WMWD's reliability assessments demonstrate that sufficient supplies will be available even under drought conditions. Additionally, WMWD actively engages in water conservation measures and demand management, which have helped in maintaining supply levels despite challenges like increased temperatures and recurring drought conditions. The DEIR has determined that the water supply is adequate to serve the proposed Project.

While the comment mentions temperature increases and ongoing drought concerns, WMWD's planning includes these factors through the Water Shortage Contingency Plan (WSCP), which addresses foreseeable and unforeseeable water shortages due to climate change and other environmental factors. This strategic approach, combined with WMWD's water conservation programs and infrastructure improvements, ensures that the water supply will remain reliable for the proposed Project.

Regarding the 20% water usage reduction goal, the project will comply with CALGreen building standards, which enforce the use of water-efficient fixtures and irrigation systems. These measures, alongside WMWD's conservation efforts, contribute to the project's alignment with regional water sustainability goals.

Additionally, as discussed throughout DEIR Section 5.19 Utilities and Service Systems (pp. 5.19-1 – 5.19-20), the proposed Project would be required to adhere to all applicable Federal, State, local, and regional regulations geared toward more efficient water use. Proposed Project compliance with these regulations would include avoiding the types of unreasonable water uses established in RMC Section 14.22.010, including application of potable water to outdoor landscapes in a manner that causes runoff to adjacent property, non-circulating fountains or water features which use potable water, and application of potable water to outdoor landscaping within 48 hours of measurable rainfall (p. 5.19-12).

Thus, no new or updated supply reports are required before continuing with the DEIR, as the current UWMP and water management plans sufficiently address the concerns raised regarding future water reliability.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.144:**

The commenter questions the Project's compliance with various Senate bills. As discussed in DEIR Section 5.19.2.2 (p. 5.19-9), per Senate Bills 610 and 221, certain types of development projects are required to provide detailed water supply assessments (WSAs) to planning agencies. However, as further discussed, thresholds requiring the preparation of a WSA for residential developments include residential developments of more than 500 dwelling units. The proposed Project would consist of 347 apartment units, which falls below the threshold of more than 500

dwelling units that would trigger the need for a project-specific WSA. Additionally, Threshold B under Section 5.19.5 Environmental Impacts discusses that Project construction water demand would be temporary and minimal in nature (p. 5.19-16 – 5.19-19). Further, the proposed Project would result in a small incremental increase of 1.4 percent to the City's population growth, which is within the City's anticipated 2025 growth projection; therefore, the Project would not require new or expanded entitlements for water supplies.

Additionally, DEIR Section 5.19.2.2 State Regulations (p. 5.19-9) lists Senate Bill 7 (SB-7) as an applicable regulation to the proposed Project. The nature of SB-7 as a State submeter requirement for multi-family housing accordingly requires the proposed Project to be designed in compliance with the stipulations of SB-7.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.145:**

The commenter raises concerns regarding fair share costs. The City's General Plan 2025 Policy PF-1.2 is a municipal measure that does not have any fair share costs identified or applicable to the proposed Project. Additionally, regarding Policy PF-3.2, DEIR Table 5.11-1 – Consistency with Applicable General Plan Policies (p. 5.11-49) explains that the proposed Project's Sewer Capacity Evaluation indicated the City's existing collection system is adequately sized for the proposed Project. Therefore, the proposed Project would not need to fund fair-share costs associated with the provision of wastewater service. Further, as indicated on the City's webpage for the General Plan, a Phase 2 General Plan Update is forthcoming.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.146:**

Please refer to Response 4.143.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.147:**

The commenter questions what "RPU 2018" is. It is believed the commenter is referring to DEIR Section 5.6.2.4 Local Regulations (p. 5.6-11), in which the DEIR discusses the Riverside Public Utilities Integrated Resource Plan, referred to in the DEIR as the "2018 IRP." The commenter additionally questions if "this report" (i.e., the 2018 IRP) reflects current/future water supplies. As stated in DEIR Section 5.6.2.4 (p. 5.6-11), the 2018 IPR provides an impact analysis of the City's

acquisition of new power resources and includes a review and analysis of both intermediate term (5-year forward) and longer term (20-year forward) resource portfolio and market issues. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

The commenter further questions if restrictions on new meters should be implemented by the City in consideration of water usage. The WMWD has sufficient water supply to service the Mission Grove Apartments project, as demonstrated by the projections in their UWMP. Future projects in the area will be evaluated on a case-by-case basis and will undergo the appropriate CEQA review to ensure water supply and environmental compliance. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.148:**

The commenter questions who pays for extensions for existing water lines which is not an issue that is required to be discussed or analyzed pursuant to CEQA. However, the following response and information is provided. The question provided does not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As it does not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does it reflect on the adequacy or content of the DEIR, it is deemed not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.149:**

Please refer to Response 4.2.

The commenter suggests the DEIR only discusses telecommunications from existing lines in the City right-of-way and questions the consideration of other types of telecommunications, such as Wi-Fi, cell phone, and internet usage that “may require line of sight capability.” The proposed Project is not anticipated to interfere with access to or usage of the aforementioned types of communication as it is typical for individuals to access Wi-Fi services and cell phone services from third-party providers who would be independent of the proposed Project. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.150:**

The commenter questions if a water supply assessment (WSA) could still be provided for the proposed Project, despite not meeting the threshold to require a WSA. As discussed in DEIR Section 5.19.2.2 (p. 5.19-9), per Senate Bills 610 and 221, certain types of development projects are required to provide detailed WSAs to planning agencies. However, as further discussed, thresholds requiring the preparation of a WSA for residential developments include residential developments of more than 500 dwelling units. The proposed Project would consist of 347 apartment units, which falls below the threshold of more than 500 dwelling units that would trigger the need for a project-specific WSA. Additionally, Threshold B under Section 5.19.5 Environmental Impacts discusses that Project construction water demand would be temporary and minimal in nature (pp. 5.19-16 – 5.19-19). Further, the proposed Project would result in a small incremental increase of 1.4 percent to the City's population growth, which is within the City's anticipated 2025 growth projection; therefore, the Project would not require new or expanded entitlements for water supplies.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.151:**

Please refer to Response 4.143.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.152:**

The commenter questions if the WMWD Service Reliability Report has correctly identified that non-WMD sources will not increase WMWD's anticipated water increases in the coming years. The table provided in the DEIR, Table 5.19-7, outlines the projected water supply and demand comparisons for both potable and non-potable water over a five-year span during multiple dry-year scenarios, with projections for 2025, 2030, 2035, 2040, and 2045.

In this table, for each year within the five consecutive dry years (e.g., first year, second year, and third year shown in the screenshot), the supply and demand figures for potable and non-potable water remain the same. This consistency reflects a calculated estimate based on the assumption that the available supply of water and the demand within the service area would remain stable throughout a prolonged dry period.

The supply numbers assume that the water resources management systems in place, including water reserves, groundwater, and imported water supplies, would maintain a steady supply despite prolonged drought conditions. The fact that the numbers do not change from year to year reflects confidence in the water management systems to deliver a consistent supply during dry years. Similarly, the demand numbers reflect stable population and usage patterns. Even during a prolonged dry period, the water demand may not fluctuate significantly due to existing water-

saving measures, consumer habits, and urban planning that anticipates dry years. These tables are part of long-term urban water management strategies, where the utility anticipates dry years and builds infrastructure and strategies (such as conservation programs or alternative water sourcing) to maintain the same level of service, regardless of drought severity.

The commenter does not provide any substantial evidence to support their claim that the data in the DEIR is incorrect. The data presented is accurate. The same figures for supply and demand across the first, second, and subsequent years of a consecutive five-year dry period demonstrate the system's ability to maintain reliable water service despite challenging conditions. This consistency is expected and reflects strong drought planning and resource management by the WMWD.

The commenter further questions the definition of multi-family residential and whether the definition includes both indoor and outdoor residential use. Riverside Municipal Code (RMC) Section 19.910.050 defines a multi-family dwelling unit as a building, or portion thereof, designed for occupancy by two or more families living independently of each other and containing two or more dwelling units. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.153:**

The commenter questions when the WMWD management plan will be finalized and if there is a final version of the plan available. WMWD's adopted 2020 UWMP is available at the following link: [https://westernwaterca.gov/DocumentCenter/View/5739/Western-2020-UWMP-with-Appendices\\_Revised-20220330?bidId=](https://westernwaterca.gov/DocumentCenter/View/5739/Western-2020-UWMP-with-Appendices_Revised-20220330?bidId=). The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.154:**

The commenter questions if a copy of the proposed Project's Airport Land Use Compatibility (ALUC) report, dated September 14<sup>th</sup>, 2023, will be provided for public review in paper and digital format. The proposed Project's ALUC report will be included as EIR Appendix M. Paper copies of the DEIR and its appendices are available for public viewing at the following City facilities during normal hours of operation: (1) Riverside City Hall, Community & Economic Development Department, Planning Division, 3900 Main Street, Third Floor, Riverside, CA 92522; (2) the Riverside Main Public Library, 3911 University Avenue, Riverside, CA 92501; and (3) Riverside Public Library, Orange Terrace Library, 20010-B Orange Terrace Parkway, Riverside, CA 92508.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.155:**



The commenter questions if the City Council's vote on the proposed Project will be held in a public forum, with planning comments/recommendations being made available to the public before being voted upon. The City Council meeting during which the proposed Project will be voted upon will include a public hearing prior to the City Council vote. Additionally, any planning comments/recommendations made during the City's Planning Commission meeting during which the proposed Project was discussed will be recorded in a staff report of the Planning Commission meeting and accessible via the City's website. The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.156:**

The commenter questions how the proposed Project reflects "changes and impacts that commit future generations to new environmental circumstances." This topic is discussed in DEIR Section 6.3.2 Commitment of Future Generations (pp. 6.0-8 – 6.0-9), which explains that the proposed change in underlying land use and zoning regulations would allow for a change of the Project site from C – Commercial to MU-U – Mixed Use-Urban for a multi-family residential development. This DEIR section discusses the potential environmental implications of this change in land use and zoning, such as population growth and irreversible commitments of law enforcement, fire protection, water supply, etc., and refers to DEIR Sections 5.14, 5.15, 5.19, and 5.20 in which these impacts are analyzed. DEIR Section 6.3.2 summarizes that no significant impacts to these topics or services would occur, and any impacts would be mitigated by the applicant's payment of impact fees for services provided (i.e., schools, fire, and transportation).

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.157:**

The commenter expresses concern for the sensitive areas identified by the Project. While the pre-school mentioned in the comment would be considered a sensitive receptor regarding air quality and noise impacts, the proposed Project's Air Quality Analysis included the nearest sensitive receptors to the proposed Project site, which are single-family residential units approximately 115 feet to the south of the site boundary (p. 5.3-26). As concluded in DEIR Section 5.3 Air Quality (pp. 5.3-26 – 5.3-27), the proposed Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, as the proposed Project would not expose the nearest sensitive receptor at 115 feet south of the site to substantial pollutant concentrations, because the pre-school located approximately 1,300 feet to the east of the site, is further from the Project site, it also would not be exposed to substantial pollutant concentrations, as the concentrations reduce with distance from the source.

Additionally, noise standards, both during construction and operation, have been met for the nearby noise-sensitive residential properties, as detailed in the DEIR Section 5.13 Noise (pp. 5.13-13 – 5.13-25), which demonstrates that noise levels would remain below the City's

established thresholds, ensuring that the sensitive receptors, including the pre-school located further from the site, would not be exposed to significant noise impacts.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.158:**

The commenter questions what the “applicant’s payment of impact fees for schools, fire, and transportation” are and if those funds will be identified “for use by the MG community”. The DEIR contains several sections identifying applicable fees the proposed Project would be subject to as well as what the particular fees fund, including:

DEIR Section 5.15.2.2 State Regulations, which explains that California Government Code 66000 allows a qualified agency, such as a local school district, the ability to impose fees on developers to compensate for the impact a project will have on existing facilities or services (p. 5.15-3). This DEIR section additionally explains California Government Code 65995, which sets base limits and additional provisions for school districts to levy development impact fees to help fund expanded facilities to house new pupils that may be generated by a development project.

DEIR Section 5.15.6 Environmental Impacts – Threshold A, which explains that Riverside Municipal Code (RMC) Chapter 16.52 – Development Fees for Fire Stations provides the City with the ability to collect development fees for the construction and purchase of land for fire stations and the acquisition of equipment and furnishings to equip fire stations (DEIR p. 5.15-7).

DEIR Section 5.17.2.2 Regional Regulations, which discusses the Western Riverside County Transportation Uniform Mitigation Fee (TUMF), which is an impact fee program that funds transportation improvements associated with new growth (pp. 5.17-4 – 5.17-5). This DEIR section additionally discusses the City’s Development Impact Fee (DIF), which is a program that funds a variety of public transportation facilities, namely traffic and railroad signs and transportation for dwelling and mobile units.

As shown, each fee applicable to the proposed Project serves the purpose of addressing/mitigating for specific impacts resulting from the proposed Project, including within the local community in which the development would occur.

Additionally, the commenter questions the definition of mixed-use, as defined in the City’s previously approved General Plan, which describes mixed-use developments as those that “blend residential and commercial uses.” In a mixed-use development, residential units and commercial spaces are integrated either within the same building or within close proximity, encouraging a walkable environment and reducing reliance on vehicular transportation. The City’s General Plan emphasizes this concept as part of its broader urban planning goals, aiming to create vibrant, multifaceted communities where residents can easily access shops, services, and other amenities without the need to travel far.

Furthermore, the City’s General Plan specifically identifies Mission Grove as a Local Shopping/Mixed-Use Center. This designation highlights the area’s intended role as a hub that

combines residential living with commercial activity, fostering a more integrated and sustainable neighborhood.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.159:**

The commenter asks what the projected population growth is for the Mission Grove area. The population growth for the Mission Grove area as a whole is not required to be calculated as part of this proposed Project or under CEQA because the Project's scope and environmental analysis focus on the direct impacts of the development itself, with growth projections for the broader area being addressed through the City's General Plan and regional planning efforts, which already account for future population increases and housing needs in the area.

Threshold A under DEIR Section 5.14.6 Environmental Impacts (pp. 5.14-4) before Mitigation discusses how the proposed Project's projected contribution to the City's population growth was calculated (DEIR p. 5.14-4). This DEIR section discusses that the expected number of proposed Project tenants is 829 persons, which would contribute approximately 1.4 percent of the City's anticipated population growth from 2020 to 2040 and approximately 0.2 percent of the 2025 General Plan's maximum population growth for the build out of the 2025 General Plan. The DEIR discusses that the approximately 1.4 percent incremental increase is anticipated to be a less than significant increase and would not exceed either the estimated growth projection or the maximum projection of the City's General Plan 2025 EIR growth projections.

Furthermore, the proposed Project is growth-accommodating by providing much-needed housing options in a well-planned, mixed-use environment that supports the City's growing population, aligns with future housing demand, and integrates with nearby commercial services and transit corridors to reduce urban sprawl and promote sustainable development.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.160:**

The commenter questions if there are any regulations requiring developers to develop economic growth opportunities, reduced travel time, or employment opportunities. Regarding economic growth, the City is in the process of developing an Economic Development Strategic Plan, information and resources for which are available on the City's web page for Economic Development – Initiatives (found at: <https://riversideca.gov/cedd/economic-development/initiatives>). Additionally, DEIR section 6.4.2 Economic Growth (p. 6.0-10) discusses how the proposed Project would generate temporary employment opportunities during construction and on-site operations such as the on-site leasing office and site maintenance of the development would generate new employment opportunities. Thus, though not required of the

developer by specific regulations, the proposed Project would contribute to the City's economic growth and employment opportunities for the existing regional work force. In addition, DEIR Sections 5.17.2.1, 5.17.2.2, and 5.17.2.3 provide a discussion of applicable State, regional, and local laws, ordinances, and standards regarding transportation and traffic, including those that would work to reduce individual travel time and vehicle miles traveled (pp. 5.17-3 – 5.17-7).

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.161:**

The commenter questions if potential/possible uses of the existing vacant building included City services such as “police, human resources, veteran usage, homeless facilities, etc.” The proposed Project was presented to the property owner for consideration, who then presented the proposed Project to the City for consideration. The City does not pre-assign specific uses or services to existing buildings or potential sites available for purchase and development. The commenter additionally questions if there had been any consideration to include commercial uses within the proposed Project and/or to reduce the number of units and building height. Section 7.0 Alternatives to the Proposed Project (p. 7.0-1) provides a list of potentially feasible alternatives considered for the proposed Project, including Alternative 2: Lower Density ALUC Consistent Multi-Family Residential Project and Alternative 3: Retail Project Alternative. In addition, the commenter suggests the proposed Project would be the “tallest (building) in the MG area, making it an eyesore.” DEIR Table 3.0-3: Building Development Standards in DEIR Section 5.1.3 Project Design Considerations (pp. 5.1-5 – 5.1-7) shows that the proposed Project's maximum building height would be 57 feet and 2 inches (57'2”), which is below the City's Site Development Standard maximum building height of 60 feet (60'). Additionally, DEIR Section 1.3 Project Description identifies one of the proposed Project's objectives as providing “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” (p. 1.0-3).

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.162:**

The commenter questions how the proposed Project has sought public participation “early-on.” In accordance with CEQA Guideline Section 15082 – Notice of Preparation and Determination of Scope of EIR, the City prepared the Notice of Preparation of a Draft Environmental Impact Report (EIR) and Scoping Meeting for the Mission Grove Apartments Project. This Notice of Preparation for the proposed Project, dated October 28, 2022, was made available for public access on the City's Planning webpage, under the Development Projects and CEQA Documents – Projects in Process section. The Notice of Preparation provided the period for public comment (October 28, 2022 through November 28, 2022) and provided information on how to attend a virtual scoping

meeting for the proposed Project, which was held on November 2, 2022. The scoping meeting provided agencies, organizations, and members of the public a brief presentation on the proposed Project and an opportunity to review the proposed Project. Additionally, during the Notice of Preparation public review period of October 28, 2022 through November 28, 2022, public agencies and interested organizations and individuals had the opportunity to identify those environmental issues with the potential to be affected by the proposed Project and that they requested to be addressed in the DEIR.

Further, the proposed Project Applicant sent community noticing postcards to a total of 768 neighbors, many of whom extended beyond a 1,000-foot radius, which exceeded the 300-foot noticing radius employed by the City. The Applicant additionally hosted an Open House Community Meeting on September 12, 2023, in a vacant space within the Mission Grove Plaza. Noticing postcards for this Open House even were also sent to residents of the Mission Grove neighborhood. In addition, the proposed Project Applicant hosted the Mission Grove Neighborhood Alliance's (MGNA) monthly meeting on October 9, 2023, at the Mission Grove Plaza and provided food, drinks, and seating for 163 attendees. Prior to hosting the October 9, 2023, MGNA meeting, the proposed Project Applicant attended the September 11, 2023, MGNA meeting to extend the invitation to host the following month's meeting. Moreover, the proposed Project Applicant attended the May 29, 2024, MGNA meeting at the Canyon Crest Country Club to engage with MGNA executive committee prior to the DEIR public comment period deadline. Thus, the proposed Project Applicant has put forth several efforts both before and during the DEIR process to notify and engage with the public and local community, providing the public with several opportunities to participate in the Project's planning process.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.163:**

The commenter questions what factors the City considered when selecting potential project alternatives and whether these considerations were made with or without public input. As discussed in DEIR Section 7.0 Alternatives to the Proposed Project (p. 7.0-1), Section 15126.6 of the CEQA Guidelines identifies parameters within which consideration and discussion of alternatives to proposed projects should occur. Per CEQA Guidelines Section 15126.6, these parameters for considering alternatives must focus on those that are potentially feasible, reduce significant impacts, and which attain most of the basic objectives of the proposed project. Accordingly, DEIR Section 7.0 presents a range of potentially feasible alternatives selected based on these parameters. The public was provided the opportunity to provide input on Project alternatives at the NOP stage, discussed in Response 4.162 above, as well as review and comment on the DEIR Section 7.0 as well as the DEIR as a whole during the public review period of May 10, 2024, through June 24, 2024, thereby complying with State CEQA procedures for public review.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.164:**

The commenter questions why the property owner and/or the City did not consider other potential uses for the existing building. The Project was proposed to the property owner for consideration before being proposed to the City for consideration. The City does not pre-assign specific uses to existing buildings or potential sites available for purchase and development.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.165:**

The commenter questions how many stories would be associated with a reduced development potentially consisting of 58 dwelling units. The reduction to 58 dwelling units in Alternative 2 was calculated to comply with the density criteria of Compatibility Zone C2 of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP), which limits residential density to 6 or fewer dwelling units per acre. This reduction was solely for the purpose of meeting the density requirement for the 9.92-acre project site.

In terms of building heights, the DEIR does not provide specific calculations or designs for the height of buildings under Alternative 2. However, it is reasonable to assume that with fewer dwelling units, the building heights would be reduced compared to the proposed project. Since this alternative involves a smaller-scale development, factors such as the number of stories would likely be less than that of the proposed 4-story buildings, but the exact height has not been determined as that would be part of detailed project planning if Alternative 2 were pursued.

Regarding aesthetics, while the impacts to aesthetics under the proposed Project are already considered less than significant, Alternative 2 would result in a smaller, less dense residential development. As such, the visual impacts under Alternative 2 would be even less than those of the proposed Project.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.166:**

The commenter's comment and/or question related to soliciting new tenants is not an issue that is required to be discussed or analyzed pursuant to CEQA. The comment provided does not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As it does not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does it reflect on the adequacy or content of the DEIR, it is deemed

not relevant to the DEIR process. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detailed contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, no changes to the DEIR are required based on this comment. This comment is noted for the record.

**Response 4.167:**

The commenter questions why off-site (alternative) locations were not considered. DEIR Section 7.0 Alternatives to the Proposed Project (p. 7.0-1) identifies Alternative 4 of the proposed Project alternatives as an “Off-Site Multi-Family Residential Project.” Additionally, Section 7.0.6 Alternative 4 – Proposed Project at Off-Site Location (p. 7.0-22) provides a description of a potentially feasible off-site location scenario, with the paragraphs following providing an environmental impact analysis for each applicable CEQA topic under this potential off-site alternative. While specific off-site alternative sites are not provided, the DEIR has addressed the requirements of CEQA Guidelines Section 15126.6 by considering a reasonable range of potentially feasible alternatives, including a potentially feasible off-site alternative.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.168:**

The commenter questions the possibility of analyzing other alternatives. As discussed in DEIR Section 7.02 Rationale for Alternative Selection (p. 7.0-2), per 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” to “foster informed decision-making and public participation” (CEQA Guidelines Section 15126.6). Accordingly, the DEIR has addressed these requirements under CEQA by analyzing and discussing potentially feasible alternatives as presented in Section 7.0 Alternatives to the Proposed Project in the DEIR.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.169:**

The commenter’s comment and/or question related to purchasing of other properties, available vacant land, and potential ownership benefits is not an issue that is required to be discussed or analyzed pursuant to CEQA. Regarding the commenter’s assertion that, “much more discussion/exchange of dialogue needs to occur before continuing with this proposed project,” in accordance with CEQA Guidelines Section 15082(a), the City provided a Notice of Preparation of a DEIR to responsible and trustee agencies, the Office of Planning and Research, and the county clerk in October 2022. The Notice of Preparation provided sufficient information describing the

proposed Project and the potential environmental effects to enable the responsible agencies to provide meaningful responses. Additionally, regarding the commenter's assertion that, "City Planning and City representatives need to seek public comments before agreeing to pursue this project," pursuant to Title 14 of the California Code of Regulations, Chapter 3, Section 15087, the City issued a Notice of Availability of a DEIR, which included information on the public review and comment period of May 10, 2024 through June 24, 2024, where to access a copy of the DEIR for public review, and where to submit public review comments. Thus, the City has complied with applicable CEQA Guidelines and regulations.

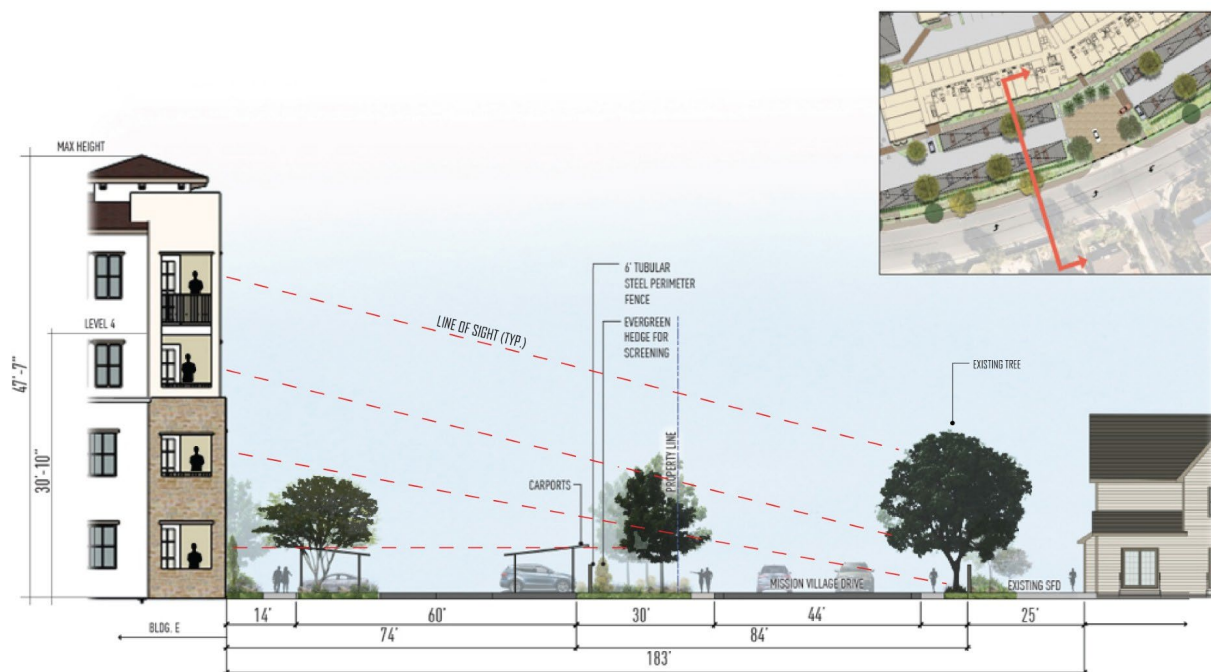
The Applicant additionally hosted an Open House Community Meeting on September 12, 2023, in a vacant space within the Mission Grove Plaza. Noticing postcards for this Open House even were also sent to residents of the Mission Grove neighborhood. In addition, the proposed Project Applicant hosted the Mission Grove Neighborhood Alliance's (MGNA) monthly meeting on October 9, 2023, at the Mission Grove Plaza and provided food, drinks, and seating for 163 attendees. Prior to hosting the October 9, 2023, MGNA meeting, the proposed Project Applicant attended the September 11, 2023, MGNA meeting to extend the invitation to host the following month's meeting. Moreover, the proposed Project Applicant attended the May 29, 2024, MGNA meeting at the Canyon Crest Country Club to engage with MGNA executive committee prior to the DEIR public comment period deadline. Thus, the proposed Project Applicant has put forth several efforts both before and during the DEIR process to notify and engage with the public and local community, providing the public with several opportunities to participate in the Project's planning process.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.170:**

The commenter asks when architectural plans will be made available. Information regarding project plans (site plan, parking allocation plan, fire access plan, open space plan, floor plans, building elevations, colors and materials, conceptual landscape plans, wall and fence plans, photometric lighting plan, conceptual grading plans, tentative parcel map) was made available July 18<sup>th</sup>, 2024 on the City of Riverside Planning Commission website (<https://aquarius.riversideca.gov/clerkdb/DocView.aspx?dbid=0&id=362780&page=1&cr=1>) as part of the package submittal for review of the proposed Project at that Planning Commission meeting and remains available at that website. The commenter additionally asks if the apartment windows will overlook existing residences. The Project will not invade privacy laws and regulations as the existing residences will not be in view from the windows of the proposed buildings, as confirmed by the Project's architectural line of sight renderings.





As outlined in the rendering above, the closest apartment building and the closest single-family residence are located 183 feet apart and separated by Mission Village Drive. The line of sight between the apartment building and the nearby residences is broken up with the following: sidewalk, landscaping, parking, carports, fencing and evergreen hedge screening at the apartment development, trees within the landscaping buffer/setback on the north side of Mission Village Drive, Mission Village Drive, and a sidewalk, landscaping and block wall on the south side of Mission Village Drive. The distance between the apartment buildings and the nearest residences as well as trees, fencing and block wall reduce the visibility of the nearby single-family residences by the apartment tenants and vice versa.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 4.171:**

The commenter questions the benefits of relocating the bus stop. The decision to relocate the bus stop approximately 200 feet north, as coordinated with the Riverside Transit Agency (RTA) and detailed in Section 5.17 Transportation (p. 5.17-8) and Appendix I, aims to improve pedestrian connectivity and transit access for the Project tenants, adjacent neighborhoods, and nearby commercial areas. This optimal placement better serves the anticipated increase in transit users, ensuring convenient access to public transit and promoting sustainable, non-vehicular travel as part of the Project's overall design.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Comment Letter 5 – Laura Sandidge Comments – Community Member**

Comment Letter 5 commences on the next page.

**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](mailto: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.

- 5.1 { 1. **Section 2, P 2.0-6 through 2.0-9:** The header states "Crestview Apartments Project DEIR", not Mission Grove Apartments DEIR.
- 5.2 { 2. **Section 6.0, P 6.0-1:** Environmental is misspelled.
- 5.3 { 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.
- 5.4 { 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.
- 5.5 { 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

- 5.5 { 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.
- 5.6 { 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?
- 5.7 { 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 Riverside's 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

- 5.7 { 

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.
- 5.8 { 

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?
- 5.9 { 

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.icedd/files/pdf/planning/2022/2022-02%20Commercial-MU%20Zones%20Handout.pdf](https://riversideca.gov/cedd/sites/riversideca.gov.icedd/files/pdf/planning/2022/2022-02%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.
- 5.10 { 

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

5.10 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.

5.11 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 decipher 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.

- 5.12 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.
- 5.13 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 two times a day, but on **page 5.3.29 (BACM AQ-1)** states the project should be watered three times a day. **Appendix B, P.23** states that active site should be watered at least two 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.
- 5.14 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.
- 5.15 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.
- 5.16 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



5.16 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?

5.17 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.

5.18 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.

5.19 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 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?

- 5.20 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.
- 5.21 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?
- 5.22 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.
- 5.23 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

- 5.23 { 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?
- 5.24 { 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?
- 5.25 { 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?
- 5.26 { 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

- 5.26 { 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.
- 5.27 { 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/grro/#p=1>).
- 5.28 { 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

5.28

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.

5.29

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.

5.30

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](mailto:nichole19161@gmail.com)

**Letter 5 – Laura Sandidge Comments****Commenter:** Laura Sandidge**Date:** June 24, 2024**Response 5.1:**

The commenter identifies typos/errors in the header of Section 2.0 of the DEIR. The DEIR, Section 2.0 Introduction (pp. 2.0-7 – 2.0-9) is revised as follows:

Section 2.0

City of Riverside

Introduction

~~Crestview~~ Mission Grove Apartments Project DEIR

It should be noted that even with these revisions to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

**Response 5.2:**

The commenter identifies a misspelling. The DEIR, Section 6.0 Introduction (p. 6.0-1) is revised as follows:

**6.0 Other CEQA Topics**

This section analyzes the Project’s consistency with regional plans, potential irreversible environmental effects, and growth-inducing impacts of the proposed Project.

It should be noted that even with these revisions to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

**Response 5.3:**

The commenter expresses concerns on the future placement of the recycling center. The recycling center will be moved to the west, outside of the Project footprint but would remain generally in the same area of the Mission Grove Plaza and continue to operate and provide service.

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 5.4:**

The commenter correctly addresses that the Riverside Crime Free Multi housing Program has been terminated. The DEIR, Section 5.15 Public Services (p. 5.15-6) is revised as follows:

~~**Policy PS 8.5:** Continue to encourage residents and apartment managers to become involved in the Crime Free Multi Housing Program as a way to reduce crime in apartment communities.~~

This was a policy in the General Plan and although deleted, the analysis in the EIR was not contingent on the implementation of this policy. Therefore, it should be noted that even with these revisions to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

#### **Response 5.5:**

Appendix I, which states an opening year of 2027 is correct and there is a typo/error in the DEIR in several places where opening year of 2028 is identified. These are corrected, and incorporated in Final EIR Section 3.0 Revisions to the Draft EIR, as outlined below.

The DEIR, Section 1.0 Executive Summary (p. 1.0-2) is revised as follows:

Construction of the proposed project is expected to occur over approximately 28 months. The project is anticipated to be fully built and open in 2027~~8~~.

The DEIR, Section 3.0 Project Description (p. 3.0-23) is revised as follows:

Construction is expected to begin in 2025 and take approximately 28 months to complete. The project is anticipated to be fully built and open in 2027~~8~~.

The DEIR, Section 5.3 (p. 5.3-1) is also revised as follows:

It is expected that construction would start in 2025 and take approximately 28 months, with an opening in 2027~~8~~.

It should be noted that even with these revisions to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

#### **Response 5.6:**

The commenter states that the lights may interfere with the nearby single-family residences and requests to know how bright the lights will be.

As outlined in the DEIR, Section 5.1 Aesthetics (p. 5.1-22), a photometric plan was prepared as part of the project plans, and no light spillage from the project outside of the property boundaries occurs. Overall levels of light generated by the new buildings and passing cars would be comparable to typical current levels at the Project site and in the surrounding developed areas. The proposed Project's exterior lighting from the building or from the parking area will meet the



City's Zoning Code requirements for support structure height, intensity, flickering/flashing, placement, shielding, orientation and style. Per the RMC Chapter 19.556.060 - Lighting Zones, commercial and mixed-use urban zoning are both in Lighting Zone 3.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.7:**

The commenter expresses concerns regarding the upcoming and ongoing nearby projects that may have a cumulative effect on the VMT analyses. Although the Traffic Operational Analysis (TOA) was initiated in 2022, it was being updated and revised until the City's final approval of it in December 2023. The cumulative project list included in the TOA summarizes all known approved and pending projects at the time the TOA is initiated and anticipated to be completed by the project's opening year. The TOA cumulative project list was approved by City staff during the TOA scoping agreement process. However, the TOA also includes a cumulative 2045 conditions analysis which was prepared using the regional travel demand model (RIVCOM). The regional travel demand model includes a larger regional analysis of cumulative projects in the area, including all projects anticipated to be completed by 2045. Additionally, these ongoing and upcoming projects would also need to comply with CEQA and take this Project into account for any required cumulative analysis.

Further, as outlined in the DEIR, Section 4.0 Environmental Setting, (p. 4.0-2) the cumulative project list included the cumulative project list for the TOA and any additional projects identified during the Notice of Preparation review and comment period, or by the City of Riverside Planning Division as a pending project as follows:

As outlined in the CEQA Guidelines Section 15130 the cumulative impact analysis in an EIR should consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Currently planned and pending projects in Riverside and surrounding areas are included in Table 4.0-1 and shown on Figure 4.0-1 – Cumulative Project Locations. The cumulative project list was developed in the Focused Traffic Analysis (TA) and created in consultation with the City of Riverside Planning and Public Works staff. The Focused Traffic Analysis is included in Appendix I. The cumulative list included projects anticipated to contribute measurable traffic impacts to the study area. The cumulative project list below includes the cumulative project list for the Focused Traffic Analysis and any additional projects identified during the Notice of Preparation (NOP) review and comment period, or by the City of Riverside Planning Division as a pending project.

Overall the cumulative projects include:

- 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).

The cumulative projects range in distance from the Project site from the closest project approximately 800 feet north, across Alessandro Boulevard, to the farthest project site, approximately 1.75 miles east, on Alessandro Boulevard (refer to Figure 4.0-1 – Cumulative Project Locations). The cumulative list of development projects in Table 4.0-1 and are considered in the cumulative analyses in Section 5.0, Environmental Impact Analysis.

Further, as outlined in the CEQA Guidelines Section 15125 Environmental Setting, the baseline conditions for the analysis in the EIR, including the cumulative project list for the cumulative analysis, is at the time the Notice of Preparation (NOP) is published.

**15125. ENVIRONMENTAL SETTING**

- (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.
- (1) Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence. In addition, a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record.
- (2) A lead agency may use projected future conditions (beyond the date of project operations) baseline as the sole baseline for analysis only if it demonstrates with substantial evidence that use of existing conditions would be either misleading or without informative value to decision-makers and the public. Use of projected future conditions as the only baseline must be supported by reliable projections based on substantial evidence in the record.

Therefore, the cumulative project list, as outlined in the DEIR, Section 4.0 Environmental Setting, (p. 4.0-2) was determined by the City of Riverside Planning Division at the time of publication of the NOP (October 28<sup>th</sup>, 2022) based on reliable projections supported by substantial evidence (current applications on file at the time as well as recently approved applications) and meets the requirements of CEQA.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.8:**

The commenter questions the use of the City of Riverside 2025 General Plan throughout the DEIR. The DEIR, Subsection 5.9.2.4 Local Regulations (pp. 5.9-7 – 5.9-8), includes the Phase 1 General Plan Update, as follows:

The GP 2025 contains a guiding principle and policies to protect against public safety issues within the City in the Public Safety Element, Phase 1 General Plan Update – Adopted 2021.

**Guiding Principle:** Comprehensively address the public safety needs and concerns of its residents, businesses, institutions, and visitors in a proactive and coordinated way to ensure protection from foreseeable natural and human-caused hazards.

**Policy PSE-2 – Hazardous Materials**

Provide high-quality and responsive police, fire, and emergency services to all residents and businesses in Riverside.

**Policy PSE-3 – Transportation**

Minimize the risk of potential hazards associated with air and ground transportation.

**Policy PSE-4 – Emergency Services**

Provide high-quality and responsive police, fire, and emergency services to all residents and businesses in Riverside.

**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, Riverside Municipal and Flabob Airports.

**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.

**Policy LU-22.5:** Review all proposed projects within the airport influence areas of Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport as noted in the Public Safety Element (Figure PS-6A – Riverside Municipal and Flabob Airport Safety Zones and Influence Areas; and Figure PS-6B – March ARB/IPA Airport Safety Zones and Influence Areas) for consistency with all applicable airport land use compatibility plan policies adopted by the Riverside County Airport Land Use Commission (ALUC) and the City of Riverside, to the fullest extent the City finds feasible.

**Policy LU-22.7:** Prior to the adoption or amendment of the General Plan or any specific plan, zoning ordinance or building regulation affecting land within the airport influence areas of the airport land use compatibility plan for Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport, refer such proposed actions for determination and processing by the ALUC as provided by Public Utilities Code Section 21670.

**Policy LU-22.9:** All development proposals within an airport influence area and subject to ALUC review will also be submitted to the manager of the affected airport for comment.

In addition, the DEIR Section 5.9 Hazards and Hazardous Materials, Subsection 5.9.9, References did also list the General Plan Phase 1 General Plan Update. Therefore, the DEIR did utilize the Phase 1 General Plan update.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.9:**

The commenter expresses concerns on the availability for mixed use zoning to accommodate the Project. The commenter references “City development standards” for MU-U and provides a web address for its location. Using the web address provided, a 2-page document titled “Generalized Requirements for Commercial and Mixed-Use Zones” is found. As titled, these are generalized requirements.

Refer to Table 2.2-1: Topical Responses to Comments, 5. Land Use and Planning, an explanation is provided for how the Project complies with the Riverside Municipal Code (RMC) Chapter 19.120, the MU-U Zone, which are not merely the generalized requirements, but the actual requirements to which a project is to be evaluated for consistency.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.10:**

The commenter expresses inconsistencies with the ALUC findings regarding the Project’s lack of compliance.

Refer to Table 2.2-1: Topical Responses to Comments.

The calculation of Non-Residential Average Intensity that is outlined on page 5.9-15 of the DEIR was prepared by the Riverside County ALUC and from the Staff Report they prepared to analyze the Project’s consistency with applicable airport land use compatibility criteria. The analysis of safety as it relates to the MARB/IPA Land Use Compatibility Plan is based on flight path and potential for planes to crash into buildings with people in them as compared to vehicles on the local streets.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.11:**

The commenter questions the opportunities for public outreach.

Refer to Table 2.2-1: Topical Responses to Comments.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.12:**

The commenter questions the appropriateness of the use of the City of Riverside 2025 General Plan. The City of Riverside's 2025 General Plan is a guidance document for strategic long-term planning that takes into account city growth and development as well as amendments to the general plan. As identified in the DEIR, Section 5.3.2.4 Local Regulations (pp. 5.3-17 – 5.3-19), the General Plan 2025 Air Quality Element policies intended to limit air pollution and reduce the potential sensitive receptor exposure that are applicable to the project are listed. As outlined in the DEIR, Section 5.3 Air Quality, the analysis in that section is based on data and information from the Air Quality, Greenhouse Gas Emissions, and Energy Impact Analysis that was prepared specifically for the proposed Project (pp. 5.3-17 – 5.3-19), which was included in Appendix B of the DEIR. Although an update to the City's General Plan is currently underway, because it has not been adopted yet, the 2025 General Plan, which is the currently adopted plan that is in effect at this time, is the appropriate General Plan to use.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.13:**

The commenter has outlined an inconsistency with the DEIR's description of the watering of the project area. The DEIR, Section 5.3 Air Quality (p. 5.3-29) is revised as follows for consistency with Appendix B and p. 5.3-21:

- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least ~~three (3)~~ two (2) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least ~~three~~ two times a day, preferably in the mis-morning, afternoon and after work is done for the day.

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

**Response 5.14:**

Please see response 5.5 above.

The correct anticipated duration of construction for the proposed Project is 28 months, as outlined in response 5.5 above, which was analyzed in the EIR and supporting technical studies (Appendix B - Air Quality, Greenhouse Gas, Energy Impact Analysis, Appendix H – Noise and Vibration Impact Analysis, and Appendix I – Traffic Operation Analysis & Vehicle Miles Traveled Analysis).

**Response 5.15:**

The commenter questions the project's solar panel's glare impacts on nearby residences. The proposed Project would have all photovoltaic solar arrays placed on the rooftops of the residential structures and atop carports.

Per the Aesthetics section under Threshold D, this subject is thoroughly addressed. A Photometric Plan was prepared as part of the Project plans and shows no light spillage from the Project outside of the property boundaries. Overall levels of light generated by the new buildings and passing cars would be comparable to typical light levels currently at the Project site and in the surrounding developed areas. The solar panel arrays constructed on the Project's roofs will be pointed upwards so as to not shed glare into nearby residences.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.16:**

The commenter has expressed concerns about whether the Riverside Fire Department's (RFD) resources will be utilized and whether they have consulted on the proposed Project.

Per the EIR, "For purposes of underwriting fire insurance, communities are classified with respect to their fire defenses and physical characteristics. These classifications are referred to as ISO ratings and range on a scale of 1 to 10. ISO Class 1 represents the highest level of fire protection and ISO Class 10 represents the lowest level of protection. A community's ISO rating takes into account water supply, fire department capabilities, communities, regulations, hazards, and climate. The availability of an adequate water supply and delivery system is a major consideration. In 2019 RFD was awarded the highest available ISO rating of Class 1. (General Plan 2025, Public Safety Technical Report)". RFD has a mutual aid agreement with all fire agencies surrounding Riverside City limits. Each agency has agreed to offer like resources upon request and availability of the requested resources. RCD has an automatic aid agreement with RCFD for the March JPA area where the closest resource, regardless of jurisdiction, responds.

Regarding Project design, the Project plans include a Fire Access Plan and the Project will provide adequate fire access to ensure the safety of the residents. The fire access will leave room for the fire trucks to come in and out of the Project site and will allow them to reach all areas of the site in case of a fire. As RFD requires a minimum 20-foot-wide fire lane, the Project's fire access will have a clear fire lane/fire access to allow room for the fire trucks to navigate through the Project. There will be four fire hydrants throughout the site and three additional along the Project's frontage with Mission Village Drive and Mission Grove Parkway South. (p. 5.9-9.) City review of the Project includes all applicable departments, including RFD. RFD also reviewed the Project and the DEIR and found it consistent with all required codes and City standards. To further document RFD's review of the Project, they issued a letter to the Planning Department indicating RFD can meet the needs of the development with current facilities and staffing.

The DEIR, Section 5.15 Public Services, page 5.15-8 is revised as follows:

Compliance with the above-mentioned state and local regulations would ensure that there would be sufficient fire protection service and facilities to accommodate the additional population resulting from the proposed Project. To further document RFD's review of the Project and that they did not identify the need for additional facilities or staffing as a result of the Project, RFD issued a letter to the Planning Department (Appendix N) indicating "The fire department can meet

the needs of the development with current facilities and staffing.” As such, impacts related to fire protection services would be **less than significant**.

It should be noted that even with these revisions to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

**Response 5.17:**

Refer to Table 2.2-1: Topical Response to Comments.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.18:**

The commenter has concerns regarding the number of parking units and their role in VMT reduction measures. The comment incorrectly assumes that all units are provided with a single parking space; however, as addressed under section 5.1 Aesthetics (p. 5.1-7), Table 3.0-3 Building Development Standards parking stalls per residential unit vary depending on unit type. The additional comments on the viability of tandem parking and the commenter’s speculative concerns about the Project and future tenants do not change the finding or impacts of the CEQA document.

Per the language of AB 1317, the leasing entity of the units of the Project would un-bundle the parking from the cost of rent and charge a separate fee for parking spot(s) that the tenant has the right of first refusal on. This would affect all residents. It is effective for Project’s issued a certificate of occupancy on or after January 1, 2025. Therefore, the Project would be required to comply.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.19:**

The commenter has expressed concerns regarding excess sound and vibratory activities during construction activities if the development were to encounter stubborn bedrock that would require demolition. The Project’s Noise and Vibration Impact Analysis Report (which is contained Appendix H to the DEIR) did not analyze blasting or the use of heavy ripping or rock breakers as it is not anticipated to be required during construction. If blasting were to be required, a noise analysis would be required and the City would need to perform some sort of subsequent CEQA review.



The Due Diligence Geotechnical Investigation is dated June 13, 2022. The report recommends the report not be relied upon after a period of 3 years due to changes in conditions of the site, due to time, or work on the site, or changes in standards and regulations, as outlined below (p. 28).

“The findings of this report are valid as of the present date. However, changes in the conditions of a property can occur with the passage of time, whether they are due to natural processes or the works of man on this or adjacent properties. In addition, changes in applicable or appropriate standards may occur, whether they result from legislation or the broadening of knowledge. Accordingly, the findings of this report may be invalidated wholly or partially by changes outside our control. Therefore, this report is subject to review and should not be relied upon after a period of three years.”

The report is approximately 2 years old and can still be relied upon for the purposes of the DEIR analysis. In addition, a Grading Plan Review and Geotechnical Update for the Project was also prepared in March 2023 and included in Appendix E to the DEIR.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.20:**

Please refer to Table 2.2-1: Topical Response to comments.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.21:**

The commenter questions the impacts of noise caused by HVACs for the Project and the efficacy of the noise shielding. As outlined in the DEIR Section 5.13 Noise (p. 5.13-1), a detailed Project specific Noise and Vibration Impact Analysis was prepared for the proposed Project and was included in the DEIR in Appendix H. Table G in the Project specific Noise and Vibration Impact Analysis identifies the City of Riverside Maximum Noise Level Standards for types of land uses, whether exterior or interior, and for various specified time periods.

For noise sources that are generally constant, such as HVAC equipment, the RMC allows an up to 5 dBA increase from the noise standard for noise levels that occur for a cumulative period of more than 30 minutes in any hour, which is identified as L50 (exterior). The L50 (exterior) standard is applicable to noise sources that are generally constant, such as HVAC equipment. Therefore, the City’s exterior daytime and nighttime 30-minute noise standards are 55-60 dBA and 45-50 dBA, respectively, for residential uses. And based on the analysis in the Project specific Noise and Vibration Impact Analysis, which is summarized in the DEIR Section 5.13 Noise, is not exceeded at nearest sensitive receptors from the Project’s HVAC equipment.

The nighttime noise standard of 45 dBA Lmax (anytime) is an interior noise standard. The Lmax (anytime) noise standard applies to noise sources that generate instantaneous maximum noise levels. The exterior-to-interior noise reduction for residential structures with standard construction is 20-25 dBA. Interior noise levels at the closest residence would not exceed the nighttime noise standard of 45 dBA Lmax (anytime).

The comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Response 5.22:**

Refer to Response 5.16.

The commenter asks if the proposed project will disrupt utilities or public services for the surrounding area due to an increase in traffic.

The DEIR evaluates fire protection, police protection, schools, parks, and other public facilities.

The proposed Project would increase fire service demands. However, as outlined in Section 5.14 Population and Housing, the Project is anticipated to contribute approximately 1.5 percent of the total anticipated population growth to the buildout of GP 2025. Due to the small proportion of the GP 2025 buildout population, the proposed Project is unlikely to contribute to a need for additional facilities, equipment, or staff.

City review of the Project includes all applicable departments, including RFD. RFD also reviewed the Project and the DEIR and found it consistent with all required codes and City standards. To further document RFD's review of the Project, they issued a letter to the Planning Department indicating RFD can meet the needs of the development with current facilities and staffing. This letter is provided in Appendix N.

The proposed Project would increase police service demands; however, this increase would be relatively minor as the Project would be developed in a generally urbanized area already served by RPD and within an area currently consisting of both commercial and residential uses.

The proposed Project would increase the demand for Riverside Unified School District facilities. However, it will comply with RMC Chapter 16.56, School Development Fee, which establishes coordination between the City and the applicable school district to develop a school development fee to mitigate the impact of residential development on local school districts.

Due to its small proportion of the General Plan's anticipated population growth, the proposed Project is unlikely to contribute toward a need for additional facilities, equipment, or staff. GP 2025 Education Element, Policy ED-5.1, ensures that sufficient libraries are provided to meet the needs of the community as it grows in size and population (pp. 5.15-6 to 5.15-10).

**Response 5.23:**

As outlined in Response 4.126.

The estimated number of residents is a reasonable estimate and based on the following breakdown from the applicant:

Unit Type	# of Units	Average Residents per Unit	Total Residents
One Bedroom Studio	24	1.5	36
One Bedroom	133	1.7	226.1
One Bedroom + Den	39	1.9	74.1
Two Bedroom	141	3.1	437.1
Three Bedroom	10	5.5	55
Total	347		828.3

There is no industry standard for estimating the number of residents in an apartment development.

The commenter suggests using the census data to determine the number of individuals per apartment unit. The census data lists the average number of individuals per household as 3.23 people, which is an average for all households including apartments and single-family residents as well. The single-family residential development adjacent to and south of the Project site include 4- and 3-bedroom households. The single-family residential development to the west of the Project and Trautwein Road are largely 4-bedroom with some 5-bedroom households. The single-family residential development to the north of the Project and north of Alessandro Boulevard are primarily 4-bedroom households. Single-family households with 3- to 5-bedrooms would be expected to contribute a higher number of individuals living in the same household toward the average calculation for the area and 1- and 2-bedroom households would be expected to contribute a lower number of individuals living in the same household towards the average calculation for the area. The majority of the Project's units are 1- and 2-bedroom, a total of 337 out of 347, and the reason why the Project's expected number of tenants is expected to be on the lower side of the range, as represented in the table above, that would contribute to the average for the area.

The project population was estimated from the Riverside County Transportation Model version 3.0 (RIVCOM 3) to be 829 persons using an average household size of 2.39 persons per

household, as outlined in the Vehicle Miles Traveled Analysis (pp. 10-11), in Appendix I of the DEIR. The RIVCOM model determines average household size of the Project depending on dwelling unit type and based on census data from areas surrounding the Project.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.24:**

The commenter incorrectly summarizes the limitations of what they are calling the “Riverside Park and Community Service Plan” regarding the proximity of parks and the ability to develop residential projects. The commenter does not provide access to this document or any direct quotes from it.

RVA staff found only one available online document, “The Riverside Parks Master Plan Vision 2030,” that matches the language of this comment.

The document only addresses the distance of 0.5 miles of parks from residences in the context of further distances being evidence of an underserved community for city-funded parks. There is no stated requirement for any development to develop parks or to limit housing to the proximity of parks. “The Riverside Parks Master Plan Vision 2030” states, “One-half (.5) mile is approximately a 10-15-minute walk for most people/families. Most residences should be within one-half mile of a neighborhood park or amenity that may satisfy common recreation needs” (p. 74). As stated above, there is no restriction on the development of housing more than 0.5 miles from a city park. It should also be noted that per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. Thus, with approximately 8.96 acres of existing park per each 1,000 residents in Riverside in 2020, the City’s existing parks exceeded the Master Plan recommendation of 5 acres per 1,000 residents. (p. 5.16-3.)

The commenter expressed concerns on the reduction of common usable spaces. The project would remove commercial parking spaces to convert sections of them to common usable space for residents and guests of residents from the current parking lot usage. This would result in a net zero decrease in common usable green space.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.25:**

The commenter questions the noise levels studied within Appendix H under tables H, I, J, K. The dates that the noise measurements were taken are identified in the Project’s Noise and Vibration Impact Analysis Report’s (which is contained Appendix H to the DEIR) Appendix A Noise Monitoring Survey Sheets, and as shown there, the short-term measurements were taken on June 28 and 29, 2022, on a Tuesday and Wednesday, and the long-term measurements were taken on July 12 to July 13, 2022 on a Tuesday and a Wednesday, ALSA confirmed when the short-term and long-term noise measurements were conducted. The Noise and Vibration Impact

Analysis Report that was in Appendix H to the DEIR erroneously indicated on page 13 that the short-term noise measurements were conducted on Monday June 28 and Tuesday June 29 and the long-term noise measurements were conducted from Tuesday July 12 to Wednesday July 13 2022. Text in Noise and Vibration Impact Analysis Report has been updated to reflect that the short-term measurements were conducted on Tuesday and Wednesday and the long-term measurements were conducted on Tuesday to Wednesday. The Noise and Vibration Impact Analysis in Appendix H of the DEIR has been corrected accordingly. Therefore, the noise analysis does reflect the higher levels of noise happening in the project area Monday through Friday, as the commenter indicates.

The DEIR, Section 5.13 Noise (p. 5.13-5) is revised as follows:

*Short-Term Ambient Noise Measurements*

Measurements of existing (ambient) noise were taken at multiple locations within the Project site as shown in Figure 5.13-1 – Noise Monitoring Locations. Short-term (20-minute) noise level measurements were conducted at the Project site ~~Monday~~ Tuesday, June 28, and ~~Tuesday~~ Wednesday, June 29, 2022.

The DEIR, Section 5.13 Noise (p. 5.13-7) is revised as follows:

*Long-Term Ambient Noise Measurements*

Three long-term (24-hour) noise level measurements were conducted from ~~Sunday~~ Tuesday, July 12 to ~~Monday~~ Wednesday, July 13, 2022.

Therefore, it should be noted that even with these revisions to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

**Response 5.26:**

The commenter asks if information on what airplanes fly out of March Air Force Base and their dimensions can be provided and who determined there is enough open space in parking area for an emergency landing.

Refer to Table 2.2-1: Topical Responses to Comments.

The project's surrounding area has space for forced landings along the Alessandro Boulevard and Mission Grove Parkways. There is no opportune space for emergency landings outside of airfields and prepared runways, but open spaces away from residential or commercial spaces can lessen the potential cumulative damage caused by sudden crash landings. These open areas are presumed to be used as an alternative to colliding with residential spaces. This discussion was based simply on review of aerial photographs of the general Project location, familiarity of the area, and considering how an emergency landing in the area might play out. However, it is acknowledged that the analysis/discussion in the DEIR was speculative and as such, is removed.

The conclusions/findings of the EIR are not based on the ability for emergency landing in the parking lot of Mission Grove Plaza.

The DEIR, Section 5.9 pp. 5.9-19 is revised as follows:

~~The Project site is currently a part of the Mission Grove Plaza Shopping Center and will continue to share parking spaces with the commercial development upon Project implementation. As such, ample open space is provided adjacent to the Project in the event an aircraft requires an emergency landing.~~

Therefore, it should be noted that even with these revisions to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment to the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

**Response 5.27:**

The commenter questions the use of the 2018 IRP use in the DEIR. The Riverside Public Utilities (RPU) 2018 Integrated Resource Plan (IRP) was the currently available IRP at the time the DEIR was prepared and thus it is the IRP referenced in the DEIR. As outlined in Response 5.7 above, per the CEQA Guidelines Section 15125 Environmental Setting, the baseline conditions for the analysis in the EIR are those at the time the Notice of Preparation (NOP) is published, including the reference documents for the EIR analysis.

As with the 2018 IRP, the 2023 IRP provides an impact analysis of Riverside's acquisition of new power resources, specifically towards meeting the state of California's aggressive carbon reduction goals; along with the effect these resources will have on the utility's future projected power supply costs. The conclusion in the DEIR related to consistency with the 2018 IRP (page 5.6-16) is that because the Project would comply with applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary the Project would support the goals presented in the 2018 IRP and would also support the goals presented in the 2023 IRP.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on its adequacy or content. It is noted for the record, and no changes to the DEIR are required.

**Response 5.28:**

The commenter disagrees with the daily trip volume averaging at 1,464 and insists that this is inaccurate because the commenter states that the DEIR drafters are biased and that there would be many more residents than the DEIR has stated. As addressed in response 5.23, the commenter's measure of the number of residents by using the census would be inaccurate and will not change the DEIR's analysis or conclusions.

The commenter also requests to know why the traffic study did not exceed its 5-mile radius. No such limitations are mentioned within Appendix I.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on its adequacy or content. It is noted for the record, and no changes to the DEIR are required.

**Response 5.29:**

The commenter states their opinion that the project size is not the right fit and a lower density would benefit the community better.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 5.30:**

The commenter requests a written response prior to the certification of the Final EIR and to be placed on any potential upcoming mailing list to receive notifications for future meetings regarding the Mission Grove Apartments project.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Comment Letter 6 – Pam O’Neil Late Comments – Community Member**

Comment Letter 6 commences on the next page.



 Outlook

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[EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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From: Jeanne O'Neill <joyincandy@gmail.com>  
Date: Wed 6/26/2024 5:37 PM  
To: Hernandez, Veronica <VHernandez@riversideca.gov>

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**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](mailto: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?

- 6.1 { • 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?
- 6.2 { • 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?
- 6.3 { • 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?
- 6.4 { • 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?
- 6.5 { • How does your project plan to encourage alternative transportation methods to reduce reliance on personal vehicles and mitigate air quality impacts?
- 6.6 { • 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

**Letter 6 – Pam O’Neil Late Comments****Commenter:** Pam O’Neil**Date:** June 26, 2024**Response 6.1:**

The commenter indicates the additional vehicles from the Project would add traffic to already crowded roads and have a damaging effect on air quality.

Please refer to Table 2.2-13: Topical Response to Comments, specifically 3. Air Quality and 10. Transportation/ VMT.

The DEIR included a detailed and thorough analysis of the vehicle trips and traffic generated by the Project which is contained in Appendix I – Traffic Operational Analysis (TOA) and VMT Analysis and in the DEIR Section 5.17 Transportation, pp. 5.17-1 – 5.17- 25. In addition to improving the signal at Mission Grove Parkway South and Plaza Driveway 2, the DEIR outlined 12 VMT Reduction Strategies, which are mitigation measures to reduce Project generated traffic.

The DEIR included a detailed and thorough analysis of the Project’s impact on air quality, which is contained in Appendix B – Air Quality, Greenhouse Gas Emissions, and Energy Impact Analysis Memorandum and in the DEIR Section 5. Transportation, pp. 5.3-1 – 5.3-29. The DEIR indicated the Project would not result in significant adverse impacts to air quality.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 6.2:**

The commenter requests a traffic impact study for 600-800 vehicles daily, presumably from the Project. The commentor did not provide any evidence for how they determined there would be 600-800 vehicles daily.

As outlined in Response 6.1 above, the DEIR includes a detailed and thorough analysis of the proposed Project’s generated traffic and associated emissions. This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 6.3:**

The commenter questions what additional mitigation measures, beyond the changing of traffic signals, would be included to lessen traffic generated by the project and its associated air quality impacts. Refer to Response 6.1 above for the measures to reduce traffic, and specifically VMT and associated emissions from the Project.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 6.4:**

Refer to Response 6.1 above, the detailed air quality analysis of the Project, which includes modeling of the project criteria pollutants, and the methodology, is contained in Appendix B to the DEIR.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 6.5:**

The commenter requests information on whether the project will provide adequate alternatives to personal vehicle usage in an effort to mitigate air quality impacts. As stated above in Response 6.3, there was no significant impact on air quality that necessitated mitigation measures for air quality.

As outlined in Response 6.1 above, the DEIR outlined 12 VMT Reduction Strategies, which are mitigation measures to reduce Project generated traffic and 4 mitigation measures (MM TRANS-1, MM TRANS-2, MM TRANS-3, and MM TRANS-4 (pp. 5.17-14 – 5.17-23).

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 6.6:**

The commenter requests an analysis of the cumulative impacts of the project and ongoing or upcoming projects. This analysis is in the DEIR, Section 5.3 Air Quality, Subsection 5.3.6 Cumulative Environmental Effects (p. 5.3-29).

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Comment Letter 7 – Chris Bardeen – Community Member**

Comment Letter 7 commences on the next page.

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

7.1 { 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?

7.2 { 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.

7.2 { 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?

7.3 { 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.

7.3 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."

7.4 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 residential density 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."



7.4 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?

7.5 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.”
- 7.5 Exactly how does the EIR define encroachment?  
How can statements like those on p. 277 and p. 485 be supported from a legal or regulatory standpoint?  
How will approval of the current project affect future projects and increase encroachment on MARB?
- 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 generated VMT.”
- 7.6 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:
- 7.7 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?
- 7.8 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.

7.8 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."*

7.9 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?

## **Letter 7 – Chris Bardeen**

**Commenter:** Chris Bardeen

**Date:** June 23, 2024

### **Response 7.1:**

The commenter claims there is an error in the EIR related to Estancia Apartments which implies the complex covers approximately 200 acres.

Please refer to Table 2.2-13: Topical Response to Comments, specifically 3. Air Quality and 10. Transportation/ VMT.

The DEIR Section 5.9 Hazards and Hazardous Materials, p. 5.9-23 and Section 6.0 Other CEQA Topics, p. 6.0-4 states:

“Estancia, located at 7871 Mission Grove Parkway South, consists of 208 units and has a density of 1.3 du/ac.”

The DEIR does not state or imply that the Estancia Apartments covers 200 acres. This comment does not affect the analysis in the DEIR.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

### **Response 7.2:**

The commenter states the large apartment building will loom over a set of houses’ yards and have windows with views into the homeowner’s yards. The commenter claims there was not an analysis of the current view and how it will be changed with the Project and asks what the Mission Grove Specific Plan’s required set backs are for Project.

Please refer to Table 2.2-1 – Topical Responses to Comments, 2. Aesthetics which includes a discussion on the proposed Project and the closest single-family residences and a rendering of the line of sight between the apartment building and the closest residences. It indicates: “The line of sight between the apartment building and the nearby residences is broken up with the following: sidewalk, landscaping, parking, carports, fencing and evergreen hedge screening at the apartment development, trees within the landscaping buffer/setback on the north side of Mission Village Drive, Mission Village Drive and a sidewalk, landscaping and block wall on the south side of Mission Village Drive. The distance between the apartment buildings and the nearest residences as well as trees, fencing and block wall reduce the visibility of the nearby single-family residences as well as trees, fencing and block wall reduce the visibility of the nearby single-family residences by the apartment tenants and vice versa.” Also refer to Response 4.170.

The DEIR, Section 5.1 Aesthetics, pp. 5.1-20 - 5.1-22 includes an analysis of the Project’s potential impacts related to a scenic vista, scenic resources, and regulations governing scenic quality and concluded all potential impacts were less than significant.

The DEIR, Section 3.0 Project Description, Table 3.0-3: Building Development Standards outlines the minimum setbacks required for the building, which are exceeded with the Project. The Mission Grove Specific Plan includes a required minimum 50-foot fully landscaped setback along Trautwein Road and Alessandro Boulevard, but does not have setback requirements for Mission Grove Parkway South or Mission Village Drive.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 7.3:**

The commenter claims that residents of the apartment complex would experience high noise levels events due to aircraft overflights, that Mitigation Measure MM Noise-3 is not sufficient mitigation for noise.

Refer to Response 4.59 above, the DEIR includes a comprehensive noise analysis in Section 5.13 Noise and discusses compliance with various regulations, such as the California Code of Regulations (pp 5.13-9 - 5.13-115). The Project will incorporate enhanced soundproofing measures, including noise-insulating windows, doors, and building materials. Building orientation and design will minimize noise intrusion, and strategic landscaping will act as a natural sound barrier, reducing noise impacts on residents. Although the Project site is located in the Zone C2 based on the MARB/IPA LUCP, the Project site is outside the 60 dBA CNEL contour. Therefore, the Project site would not be exposed to aircraft noise exceeding the exterior noise standards of 65 dBA CNEL based on the MARB/ IPA LUCP Countywide Policy 4.1.5 (DEIR Section 5.13 Noise pp. 4.13-24 - 4.13-25).

Also refer to the Riverside County Airport Land Use Commission Staff Report, Agenda Item 3.2, Hearing Date September 14, 2023 for the Project, page 5 of 10 (Appendix M), which indicates: “Noise: The March Air Reserve Base/ Inland Port Airport Land Use Compatibility Plan depicts the site as being below the 60 CNEL range from aircraft noise. Therefore, no special measures are required to mitigate aircraft-generated noise.”

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 7.4:**

The commenter claims the EIR has conflicting statements related to consistency with the MARB IPA ALUC and that it is confusing it uses two different definitions of density.

The statements in the EIR that the Project is “consistent with the residential development surrounding MARB/IPA (p. 321 and 485), “consistent with other multi-family residential development in the C2 Zone (p. 486) is correct and indicates the Project is consistent with the other multi-family residential developments (underline added for emphasis) in the area that are also in the C2 Zone. This is just indicating the proposed Project is similar in nature and size (number of units) to other apartment developments surrounding the Project site. These statements do not conflict with other statements in EIR that are related to the Project’s inconsistency with the maximum allowable residential density criteria in the MARB/IPA ALUC for Zone C2 (underline added for emphasis). “Consistency” is used when referring to existing surrounding apartment developments and “inconsistency” is used when referring to the Project exceeding the maximum allowed residential density for Zone C2 of the MARB/IPA LUCP.

Two different definitions of density were not used in the EIR for the purpose of confusing readers. Rather, the Riverside County ALUC Consistency with MARB/IPA Analysis and Findings as outlined in the DEIR on pp. 5.9-14 – 5.9-15 (page 269-269 of the PDF file) outline two different

ways the allowed concentration of people within a given area within Zone C2 are measured which is residential density and non-residential average intensity from the MARB/IPA ALUC. Residential density is the number of dwelling units within each acre of land, dwelling units per acre. The non-residential intensity is the maximum number of persons per acre, which is limited to 200 people per acre for Zone C2. Riverside County ALUC Consistency with MARB/IPA Analysis and Findings concluded that the Project was not consistent with the residential density but was consistent with the average intensity criterion, which is explained in the DEIR pp. 5.9-14 – 5.9-15.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 7.5:**

The commenter claims that the DEIR incorrectly indicates the Project will not encroach on the function of MARB as a military/cargo airport and that if the Project is approved it will set a precedence for approval of future developments with the same or higher density.

Refer to Response 7.4 above, which includes a clarification of what is meant by consistency with surrounding existing residential development in the Project area as compared to incompatibility with the MARB/IPA ALUCP residential density criteria for Zone C2.

Please refer to Table 2.2-1 – Topical Responses to Comments, 6. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, which indicates as further outlined in Appendix O – Johnson Aviation Consulting Technical Memorandum, Mission Grove Apartments Project – Response to ALUC Comment on City’s Intent to Overrule, the ALUC letter cites three main comments in response to the City’s Findings of the intent to overrule resolution. These same comments are echoed in the Caltrans letter. The three comments all focus on the proposed residential density and purport that the density introduces a new safety risk beyond that which already exists with the current commercial land use designation. The Project will not affect the orderly expansion of the March ARB. It is located 3.3 miles from the closest point on Runway 14/32 and surrounded by fully developed, existing residential and commercial land uses. The Project site is in a dense, urban neighborhood that is more than 9,300 feet west of the nearest point of Runway 14 Accident Potential Zone II (APZ-II) and has coexisted with the Airport for decades with no aircraft accidents or incidents within the Compatibility Zone C2. The existing commercial land use designation allows for more intense use and people per acre than the Project’s proposed density (p. 3). The Project’s average intensity would be 123 people per acre or approximately 61.3 percent of the allowable 200 people per acre commercial average intensity in Compatibility Zone C2 (p.5). No actual safety risk has been documented by ALUC within the ALUCP or the ALUC Staff Report for the Project (p. 5).

As outlined in the DEIR, Section 5.9 Hazards and Hazardous Materials, p. 5.9-22:

“The City Council of the City of Riverside, by a two-thirds vote (per RMC Title 19), has the authority to overrule the Riverside County ALUC decision based on specific findings that the proposed Project is consistent with the purposes of ALUC law to protect public health, safety and welfare ensuring (1) the orderly expansion of airports, and (2) the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.”

Thus, there is an extensive process that is required for the City to overrule an ALUC decision, including specific findings and a City Council two-thirds vote. Any future development projects that exceed the residential density criteria of the MARB/IPA ALUC would require the same



process. Therefore, if City Council approves the proposed Project it would not make it easier for future projects to get approved; the same process would be required.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 7.6:**

The commenter indicates the effects of the project on local traffic levels is going from bad to worse and that the data in Table 5.17-2 is confusing and seems to assume that each resident relies primarily on mass transit or bicycles.

As outlined in the DEIR, Section 5.17 Transportation, p. 5.17-13, the 2018 VMT per capita is baseline data before the Project would be operational, if approved. DEIR analysis does not assume that each resident relies primarily on mass transit or bicycles; rather primarily by vehicles, as outlined on p. 5.17-9, the project trip generation rate is anticipated to be 1,464 net daily trips, with 128 net trips occurring during the a.m. peak hour and 124 net trips occurring during the p.m. peak hour. The VMT analysis in the DEIR is based on VMT Analysis and the Traffic Operational Analysis (TOA) prepared for the Project (contained in Appendix I) in accordance with the City of Riverside Public Works Department *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2020). The DEIR discloses that pursuant to the criteria contained in the City's VMT analysis guidelines, the proposed Project's effect on VMT would be considered significant (p. 5.17-13).

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 7.7:**

The commenter indicates the traffic analysis is lacking or non-existent as the queuing analysis only considers the "Mission Grove/Alessandro interchange" [presumed to be the Mission Grove Parkway/ Alessandro Boulevard intersection], not the shopping center entrance and what the impacts from left-turn delays from Alessandro would be.

As outlined in the DEIR, Section 5.17 Transportation, p. 5.17-10, the Traffic Operational Analysis (TOA) prepared for the Project (contained in Appendix I) included a queuing analysis for the following six intersections/driveways:

- Mission Grove Parkway/Alessandro Boulevard;
- Mission Grove Parkway/Mission Village Drive;
- Project Driveway 1/ Plaza Driveway 2;
- Mission Grove Parkway/ Plaza Driveway 2;
- Mission Grove Parkway/ Project Driveway 2; and
- Project Driveway 3 – Bayou Lane/Mission Village Drive.

The DEIR, Section 5.17 Transportation, pp. 5.17-10 – 5.17-11 outlined which intersection/driveways would have queues that would exceed the available turn pocket storage length under opening year and cumulative with the Project and include:

- Mission Grove Parkway/Alessandro Boulevard: southbound left-turn (a.m. peak hour)
- Mission Grove Parkway/Mission Village Drive: westbound left-turn (both a.m. and p.m. peak hours)

- Mission Grove Parkway/ Project Driveway 2; northbound left-turn (a.m. peak hour) and eastbound left-turn (both a.m. and p.m. peak hours).

The DEIR, Section 5.17 Transportation, pp. 5.17-10 – 5.17-11 indicates:

“It should be noted that the proposed Project does not add any Project trips for the movements that exceed the storage lanes at the intersections of Mission Grove Parkway South/ Alessandro Boulevard and Mission Grove Parkway South/ Mission Village Drive. The proposed Project does add Project traffic at the movements that are forecast to exceed the storage lengths at the intersection of Mission Grove Parkway South/ Plaza Driveway 2 (under Opening Year and Cumulative With Project scenarios), for the northbound left turn and eastbound left turn movements. Therefore, improvements were identified at this intersection to alleviate the respective queuing deficiencies.”

Therefore, the DEIR did not just include queuing analysis for the Mission Grove Parkway/ Alessandro Boulevard intersection, it did for five others. Although the Plaza Driveway 1/ Alessandro Boulevard intersection was analyzed as part of the Traffic Operational Analysis (TOA) prepared for the Project (contained in Appendix I of EIR), per Figure 4 Project Trip Distribution of that report, there are no trips anticipated to make a left turn lane into the plaza area, thus a queuing analysis at this study area intersection was not warranted.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 7.8:**

The commenter indicates they could not find analysis of traffic delay for east/west traffic adjacent to the Project site and cut through on neighborhood street.

As outlined in the DEIR, Section 5.17 Transportation, p. 5.17-10, while the Traffic Operational Analysis (TOA) prepared for the Project (contained in Appendix I) examined Level of Service within the Project vicinity, a deficiency in LOS is no longer considered a significant transportation related impact pursuant to CEQA guidelines. LOS is automobile delay-based Level of Service (LOS). Consistency with General Plan policies are addressed in the DEIR in Section 5.11 Land Use, Table 5.11-1: Summary of Consistency with Applicable General Plan Policies (pp. 5.11-18 – 5.11-19), and the Project’s LOS analysis and accompanying tables can be found in Appendix I – Traffic Operational Analysis.

Although the Project Driveway 3 – Bayou Lane/Mission Village Drive intersection was analyzed as part of the Traffic Operational Analysis (TOA) prepared for the Project (contained in Appendix I of EIR), per Figure 4 Project Trip Distribution of that report, there are no trips anticipated to go south onto Bayou Lane, which is the only adjacent/nearby road that cuts through a residential neighborhood.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 7.9:**

The commenter claims that the EIR makes no attempt to quantitatively analyze cumulative effects of the proposed Project in combination with all the other proposed projects.

Please refer to Response 4.4 above. The cumulative project list is developed at the time the technical studies and EIR are initiated and include all known approved and pending projects that are anticipated to be completed by the proposed Project’s opening year and are located within



Project's study area, including adjacent County of Riverside and Moreno Valley. The cumulative project list evaluated in this EIR is found in Table 4.0-1 (p. 4.0-3). Projects that are included in the cumulative project list are those that due to their location and size are anticipated to affect the proposed Project's study area.

In addition, the traffic analysis prepared for the Project also included a cumulative (2040) conditions analysis which was prepared using the regional travel demand model RIVCOM. This regional travel demand model includes all projects anticipated to be completed by the year 2045, and thereby included the cargo facility along with other cumulative developments in the region. Thus, a cumulative quantitative analysis was prepared and included in the EIR.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Comment Letter 8 – Mike McCarthy – Community Member**

Comment Letter 8 commences on the next page.

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:

8.1

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.

8.2

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)

8.2 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

8.3 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>1</sup> <https://www.riversideca.gov/cedd/sites/riversideca.gov.chedd/files/pdf/planning/general-plan/2023/2022-09%20Final%20Certified%20HE%20Housing%20Element.pdf>

8.4

### 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>2</sup> <https://riversideca.gov/cedd/sites/riversideca.gov.chedd/files/pdf/planning/spec-plans/mission-grove-sp.pdf>

<sup>3</sup> <https://www.point2homes.com/US/Neighborhood/CA/Riverside/Mission-Grove-Demographics.html>

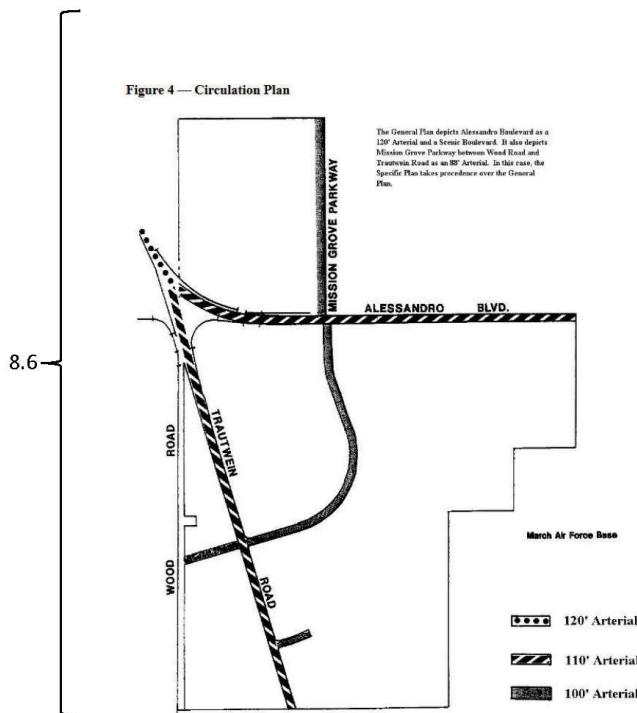
8.4 { previous planning documents (housing element, general plan, mission grove specific plan, ALUC) and is therefore a significant and unavoidable impact to the Mission Grove neighborhood.  
Reduced density and ground-floor retail would reduce the significant and unavoidable impacts of the inconsistencies with all of the existing planning documents.

8.5 { **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).

8.6 { **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>4</sup><https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/forms/2022/COMMERCIAL%20ZONES%20HANDOUT%20-%20A10.pdf> – footnote 8





**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

8.8 { 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.

8.9 { **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.



**Letter 8 – Mike McCarthy****Commenter:** Mike McCarthy**Date:** June 24, 2024**Response 8.1:**

The commenter indicates a residential infill development is a good use of the land, but progress towards RHNA is an incremental goal made across dozens of projects and the Project need to reduce its inconsistency with the General Plan, ALUC and Title 19 Development Standards.

These comments do not pertain to the environmental analysis, findings, or conclusions presented in the DEIR. As it does not introduce new information, evidence, or concerns related to the environmental impacts assessed in the DEIR, nor does it reflect on the adequacy or content of the DEIR, it is deemed not relevant to the EIR analysis. As outlined in the CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), (a) the lead agency shall respond to comments raising significant environmental issues received during the comment period and (c), the level of detail contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). Therefore, these comments are noted for the record, however no response is required pursuant to CEQA and no changes to the DEIR are required based on them.

**Response 8.2:**

The commenter states the Project can be made significantly more consistent with existing General Plan, Mission Grove Specific Plan, ALUC and March ARB by lowering the residential density from 30 dwelling units/acre to the designated and allowable 12 units/acre and replacing first-floor residential with first-floor retail/commercial on frontage buildings.

Refer to Response 2. 2 above, the City did in fact consider a Project alternative that allows for residential development in compliance with the ALUCP compatibility policies, as outlined in the DEIR, Section 7.0 Alternatives to the Proposed Project, pp. 7.0-1 - 7.0-15, Alternative 2: Lower Density ALUC Consistent Multi-Family Residential. Although Alternative 2: Reduced Density Apartment Redevelopment would have reduced impacts related to Hazards and Land Use and Planning, it does not meet the Project's objectives (DEIR pp. 7.0-29 – 7.0-30).

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required. This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 8.3:**

The commenter indicates Figure AFFH-26 in the Housing Element Technical Report identified 'opportunity sites' for affirmatively further fair housing based on vacant and underutilized sites in high resource areas and it is not clear why the Project site was not identified.

The City of Riverside adopted the Housing Element as part of the Phase 1 General Plan Update in 2021. The Technical Background Report (TBR) of the Housing Element is the baseline data and information that supports and informs the Housing Element and was being prepared prior to finalizing the Housing Element and its adoption in 2021. As outlined in the DEIR Section 1.0

Introduction (p. 1.0-2) and 3.0 Project Description p. 3.0-1 the K-Mart retail store closed in October of 2020. Therefore, the K-Mart retail store was still in operation during preparation of the TBR and would not have been identified as a vacant available site.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 8.4:**

The commenter indicates the Project is not consistent with the City's General Plan Policy LU-69.1, the current zoning for the Mission Grove area and that the Project's estimated 829 tenants would increase the population of Mission Grove by 11%.

The DEIR includes a thorough and detailed analysis of the Project's consistency with applicable General Plan (GP 2025) policies, the Riverside Municipal Code (RMC), zoning, the Mission Grove Specific Plan, and the MARB/IPA LUCP in Section 5.11 Land Use and Planning pp. 5.11-1 – 5.11-64. The DEIR acknowledges the Project is not consistent with GP 2025 policies CCM-11.1, LU-22.3, LU-22.5, and LU-69.1, which is a significant and unavoidable impact (pp. 5.11-63 – 5.11-64). The DEIR indicates that the Project requires a General Plan Amendment, a Zone Change, and a Specific Plan Amendment as the proposed Project is not consistent with the existing General Plan land use designation, existing zoning, and existing Mission Grove Specific Plan.

The standard method for analyzing whether a Project's population growth is significant or not is how it relates to the City's total population. As outlined in the DEIR, Section 5.14 Population and Housing, p. 5.14-4, the Project is anticipated to contribute approximately 1.4 of the anticipated City population growth from 2020-2040, a less than significant impact.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 8.5:**

The commenter states the assessment of the Project's consistency with non-residential average intensity and non-residential single-acre intensity are not applicable, if the project included non-residential uses such as ground floor retail/commercial/office the Project would be partially consistent with the MARB/IPA LUCP, and reduced residential density would help bring the Project into greater consistency with ALUC.

Please refer to Response 7.4 above. The Riverside County ALUC Consistency with MARB/IPA Analysis and Findings are included in the DEIR on pp. 5.9-14 – 5.9-15 and outline two different ways the allowed concentration of people within a given area within Zone C2 are measured, which is residential density and non-residential average intensity from the MARB/IPA ALUC. The different methods of measuring people concentration of a Project within the Zone C2 was determined by Riverside County ALUC staff and is appropriate for the Project.

The commenter does not provide any evidence for how including non-residential uses such as ground floor retail/commercial/office in the Project would make it partially consistent with the MARB/IPA LUCP. The DEIR analyzed a reduced density alternative that would be consistent with ALUC, refer to DEIR Section 7.0 Alternatives, for the detailed analysis of Alternative 2 – Reduced Density Apartment Redevelopment (pp. 7.09 – 7.0-15).

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 8.6:**

The commenter states the Project has no ground floor retail proposed and it is not clear why the Project was not found inconsistent with Mixed-Use Urban (MU-U) zoning.

Please refer to RMC Section 19.120.101, which defines the allowable configuration of uses in the mixed use zone. Please also refer to Table 2.2-13: Topical Response to Comments, specifically 5. Land Use and Planning.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 8.7:**

The commenter claims the cumulative analysis in the EIR omits various recent projects and that the cumulative transportation impacts from the development with no bike or pedestrian infrastructure added is a significant impact.

Please refer to Responses 4.4, 4.140, and 5.7 above related to the Project's cumulative analysis.

Please refer to Table 2.2-13: Topical Response to Comments, specifically 10. Transportation/VMT for discussion of the measures to enhance pedestrian infrastructure and bicycle facilities and the Project's goals of encouraging walkability and enhancing pedestrian connectivity.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 8.8:**

The commenter indicates they walk to the stores at the Mission Grove shopping center and the Project would increase the distance they must walk as there are no pass through alleyways to walk through the Project as compared to around.

There are currently no pass through alleyways/walkways in between the vacant K-Mart retail building and the remainder of the shopping center. Because the proposed Project has a larger building footprint and will not have pass through alleyways/walkways, nearby residents accessing shopping via walking would have to walk slightly further around the proposed Project, via Mission Grove Parkway South to the other stores/ businesses. Pedestrian access to the shopping center via Mission Village Drive and the plaza driveway between Stater Brothers Market and the movie theater would not change.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

**Response 8.9:**

The commenter indicates the Project is currently inconsistent with several City policies and development standards and could be mitigated through Alternative 2 or a truly mixed-use project with ground floor retail.

The DEIR includes a thorough and detailed analysis of the Project's consistency with applicable General Plan (GP 2025) policies, the Riverside Municipal Code (RMC), zoning, the Mission Grove Specific Plan, and the MARB/IPA LUCP in Section 5.11 Land Use and Planning pp. 5.11-1 – 5.11-64. The DEIR acknowledges the Project is not consistent with GP 2025 policies CCM-11.1, LU-22.3, LU-22.5, and LU-69.1, which is a significant and unavoidable impact (pp. 5.11-63 – 5.11-64). The commenter does not provide any evidence for how a “truly mixed-use project with ground floor retail” would reduce inconsistencies with GP policies.

The DEIR analyzed a reduced density alternative that would be consistent with ALUC, refer to DEIR Section 7.0 Alternatives, for the detailed analysis of Alternative 2 – Reduced Density Apartment Redevelopment (pp. 7.09 – 7.0-15). However, The City Council finds that Alternative 2 fails to meet key Project objectives, particularly maximizing the residential potential of the site and providing a significant contribution to the City's housing needs and would underutilize a key infill site and not meet the City's long-term planning and housing goals.

This comment does not provide new information or evidence related to the analysis completed in the DEIR and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and no changes to the DEIR are required.

## 2.5 References

The following references were used in the preparation of this section of the FEIR:

Appendix K	Mission Grove Alliance Comment Letters
Appendix L	WMWD Will Serve Letter
Appendix M	Riverside County ALUC Staff Report
Appendix N	City of Riverside Fire Department Letter
Appendix O	Johnson Aviation Consulting Technical Memorandum, Mission Grove Apartments Project – Response to ALUC Comment on City’s Intent to Overrule
2023 IRP	Riverside Public Utilities 2023 Integrated Resource Plan (IRP), available at <a href="https://www.riversideca.gov/power-resources">Power Resources   Riverside Public Utilities (riversideca.gov)</a> , accessed on July 19, 2024.

### 3.0 Revisions to the Draft EIR

This section presents other specific changes to the text of the Draft EIR that have been made to clarify information presented in the Draft EIR or to update information presented in the Draft EIR based on new regulatory or policy guidance since preparation of the Draft EIR. The changes in this section are in addition to the changes and revisions to the Draft EIR that have been made in response to the comments received on the Draft EIR, as presented in Section 2.0, Response to Comments. However, the revisions presented above in Section 2.0 are also shown below. These revisions are not considered significant new information that would trigger Draft EIR recirculation pursuant to State CEQA Guidelines Section 15088.5. For example, they do not disclose a new or substantially worsened significant environmental impact, or a new feasible mitigation measure or alternative not proposed for adoption. Rather, the revisions correct or clarify information presented.

Where revisions to the main text are called for, the section and page are set forth, followed by the appropriate revision. Added text is indicated with underlined text. Text deleted from the Draft EIR is shown in strikethrough. Page numbers correspond to the page numbers of the Draft EIR. Furthermore, any and all revisions related to mitigation measures have been incorporated into the Mitigation Monitoring and Reporting Program (MMRP).

#### 3.1 Text Revisions to the Draft EIR

**The header of Section 2.0, Introduction, pp. 2.0-7 – 2.0-9 is revised as follows:**

Section 2.0

City of Riverside

Introduction

Crestview Mission Grove Apartments Project DEIR

**Section 3.0, Project Description, p. 3.0-23 is revised as follows:**

In furtherance of the City's Climate Action Plan, replace ~~aging~~ older building construction with newer and more green building practices and other sustainable development methods.

**Section 3.0, Project Description, p. 3.0-23 is revised as follows:**

Construction is expected to begin in 2025 and take approximately 28 months to complete. The project is anticipated to be fully built and open in 2027~~8~~.

**Section 5.2, Agriculture and Forestry Resources, p. 5.2-3 is revised as follows:**

The ~~pProject~~ site does not contain riparian vegetation, ~~including scrub woodland, and forest subtypes that are associated with waterways and drainages throughout the City. (GP 2025 PEIR).~~ The pProject site does not contain timberland, is not zoned for timberland

production and is not next to land zoned for timberland. The City has no designated forest land or timberland as defined in Sections 12220[g] and 4526 of the *California Public Resources Code*. Therefore, the pProject would have **no impact** on forest land or timberland.

**Section 5.3, Air Quality, p.. 5.3-1 is revised as follows:**

It is expected that construction would start in 2025 and take approximately 28 months, with an opening in 2027~~8~~.

**Section 5.3, Air Quality, p. 5.3-29 is revised as follows:**

The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least ~~three (3)~~ two (2) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least ~~three~~ two times a day, preferably in the mid-morning, afternoon and after work is done for the day.

**Section 5.7, Geology and Soils, p. 5.7-12 is revised as follows:**

~~Western Municipal Water District (WMWD)~~The City disposes of wastewater for the Project site and surrounding area, ~~and has supplied a Will Serve letter to the Project Applicant.~~

**Section 5.9, Hazards and Hazardous Materials, p. 5.9-15 is revised as follows:**

~~Based on the number of parking spaces provided (347 standard vehicles) the total occupancy would be estimated at 521 people for an average intensity of 53 people per acre, which is consistent with the Compatibility Zone C2 average intensity criterion of 200 people per acre. ALUC misstated the number of spaces provided by the project and found that based on the number of parking spaces provided (misstated as 347 standard vehicles), the total occupancy would be estimated at 521 people for an average intensity of 53 people per acre, which is consistent with the Zone C2 intensity criterion of 200 people per acre. However, the Project provides 604 parking spaces. As such, using ALUC's methodology, the total occupancy would be estimated at 906 people, for an average intensity of 91 people per acre. This remains considerably lower than Zone C2 average intensity criterion of 200 people per acre. Thus, while the unit count may exceed ALUC's residential density requirements, the actual number of people onsite would be much lower than what ALUC would allow in Zone C2 if this were a commercial development, and accordingly would not impose a safety impact due to the intensity of people onsite in the event of an emergency.~~

**Section 5.9, Hazards and Hazardous Materials, p. 5.9-19 is revised as follows:**

~~The Project site is currently a part of the Mission Grove Plaza Shopping Center and will continue to share parking spaces with the commercial development upon Project implementation. As such, ample open space is provided adjacent to the Project in the event an aircraft requires an emergency landing.~~

**Section 5.9, Hazards and Hazardous Materials, p. 5.9-23 is revised as follows:**

Estancia, located at 7871 Mission Grove Parkway South, consists of 208 units and has a density of 17.3 du/ac.

**Section 5.10, Hydrology and Water Quality, pp. 5.10-6 – 5.10-7 is revised as follows:**

~~City of Riverside Green Action Plan~~

~~The City of Riverside is committed to becoming a clean, green and sustainable community. Beginning in 2005, a task force of citizen volunteers assembled to outline sustainability goals resulting in the City's 2009 designation by the California Department of Conservation as an "Emerald City". Developed by the Green Accountability Performance Committee, the Green Action Plan in its eighth iteration lists 19 goals and more than 50 tasks for the City to achieve additional sustainability goals and reduce its ecological footprint.~~

~~Goal 16 of the current Green Action Plan states, "Reduce per capita water usage 20 percent citywide by 2020" and Goal 17 states, "Increase the use of recycled water by 30 percent by 2020, based on the 2008 baseline (GAP, p. 32)." An update to the Green Action Plan is currently pending by the City.~~

~~In order to effectively conserve water, the Project includes water conservation and efficiency measures as discussed in Section 3 – Project Description. The Project is also subject to RMC Chapter 14.22 – Water Conservation that includes the Water Conservation Ordinance, drought plan, and water conservation programs that help water users throughout the City conform to local and state regulations for water conservation including drought-related regulations.~~

**Section 5.11, Land Use and Planning, p. 5.11-1 is revised as follows:**

The Mills Water Filtration Plant operated by Western Municipal Water District Metropolitan Water District creates a relatively large expanse of open space that abuts Sycamore Canyon Wilderness Park on the north side of Alessandro Boulevard on the community's easterly edge.



**Section 5.11, Land Use and Planning, Table 5.11-1 Consistency with Applicable General Plan Policies, p. 5.11-19 is revised as follows:**

The intersection of Trautwein Road/Mission ~~Village Drive Grove Parkway~~ is forecast to continue to operate at a deficient LOS. This intersection currently operates at LOS E under no Project conditions and there are no feasible improvements at this intersection for all Project scenarios that would cause the intersection to operate at a more acceptable level. As such, the Project would pay its fair share of the cost required to offset operational deficiencies. Since there are no feasible improvements for the Trautwein Road/ Mission ~~Village Drive Grove Parkway~~ intersection, the Project's fair share would be based on Project traffic as a percentage of total growth from existing to cumulative conditions, which would be fair share percentage of 3.22%.

**Section 5.11, Land Use and Planning, p. 5.11-54 is revised as follows:**

On September 14, 2023, the Riverside County ALUC, by a 5-0 vote, found the proposed Project, ~~City of Riverside Case Number ZAP1111RI23, es. PR-2022-001359~~ inconsistent with the 2014 MARB/ IPA LUCP, based on the fact that the project is inconsistent with the required residential density criteria.

**Section 5.11, Land Use and Planning, p. 5.11-56 is revised as follows:**

~~Based on the number of parking spaces provided (347 standard vehicles) the total occupancy would be estimated at 521 people for an average intensity of 53 people per acre, which is consistent with the Compatibility Zone C2 average intensity criterion of 200 people per acre. ALUC misstated the Page 10 July 18, 2024, PR-2022-001359 number of spaces provided by the project and found that based on the number of parking spaces provided (misstated as 347 standard vehicles), the total occupancy would be estimated at 521 people for an average intensity of 53 people per acre, which is consistent with the Zone C2 intensity criterion of 200 people per acre. However, the Project provides 604 parking spaces. As such, using ALUC's methodology, the total occupancy would be estimated at 906 people, for an average intensity of 91 people per acre. This remains considerably lower than Zone C2 average intensity criterion of 200 people per acre. Thus, while the unit count may exceed ALUC's residential density requirements, the actual number of people onsite would be much lower than what ALUC would allow in Zone C2 if this were a commercial development, and accordingly would not impose a safety impact due to the intensity of people onsite in the event of an emergency.~~

**Section 5.13, Noise, p. 5.13-5 is revised as follows:**

*Short-Term Ambient Noise Measurements*

Measurements of existing (ambient) noise were taken at multiple locations within the Project site as shown in Figure 5.13-1 – Noise Monitoring Locations. Short-term (20-

minute) noise level measurements were conducted at the Project site ~~Monday~~ Tuesday, June 28, and ~~Tuesday~~ Wednesday, June 29, 2022.

**Section 5.13, Noise, p. 5.13-7 is revised as follows:**

*Long-Term Ambient Noise Measurements*

Three long-term (24-hour) noise level measurements were conducted from ~~Sunday~~ Tuesday, July 12 to ~~Monday~~ Wednesday, July 13, 2022.

**Section 5.13, Noise, p. 5.13-12 is revised as follows:**

<sup>5</sup> **Normally AUnacceptable:** New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

<sup>6</sup> **Conditionally AUnacceptable:** New construction or development should generally not be undertaken, unless it can be demonstrated that noise reduction requirements can be employed to reduce noise impacts to an acceptable level. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

**Section 5.13, Noise, p. 5.13-25 is revised as follows:**

The Project would not exceed any of the noise thresholds of significance and potential Project-related impacts would be less than significant. Although impacts would be less than significant and no noise reduction mitigation measures are necessary based on the noise impact analysis conducted for the Project pursuant to CEQA guidelines, mitigation measures have been included in compliance with the Mission Grove Specific Plan due to the Project's location within the plan's boundaries. ~~Additionally, t~~The mitigation measures related to construction noise in the Mission Grove Specific Plan (outlined below as MM NOISE-1 and MM NOISE-2) requiring the use and proper maintenance of noise-reducing devices on construction equipment would minimize construction-related noise and ensure construction noise would not be generated during the more sensitive nighttime hours.

**Section 5.15, Public Services, p. 5.15-6 is revised as follows:**

~~**Policy PS-8.5:** Continue to encourage residents and apartment managers to become involved in the Crime Free Multi-Housing Program as a way to reduce crime in apartment communities.~~

**Section 5.15, Public Services, p. 5.15-7 is revised as follows:**

However, as outlined in Section 5.14 Population and Housing, the Project is anticipated to contribute approximately 1.45 percent of the total anticipated population growth to buildout of GP 2025.

**Section 5.15, Public Services, p. 5.15-8 is revised as follows:**

Compliance with the above-mentioned state and local regulations would ensure that there would be sufficient fire protection service and facilities to accommodate the additional population resulting from the proposed Project. To further document RFD's review of the Project and that they did not identify the need for additional facilities or staffing as a result of the Project, RFD issued a letter to the Planning Department (Appendix N) indicating "The fire department can meet the needs of the development with current facilities and staffing." As such, impacts related to fire protection services would be **less than significant**.

**Section 5.17, Transportation, p. 5.17-18 is revised as follows:**

Riverside Transit Routes 20 and 22 serve the proposed Project site with a stop at the corner of Mission Village Drive and Mission Grove Parkway South.

**Section 5.18, Tribal Cultural Resources, p. 5.18-6 is revised as follows:**

On October 18<sup>th</sup>, 2022, the City of Riverside sent out to AB 52 consultation notices to Tribes. The following tribes requested to consult with the City pursuant to AB 52:

- Soboba Band of Luiseno Indians
- Morongo Band of Mission Indians
- Aegua Caliente Band of Cahuilla Indians

On December 6<sup>th</sup> 2022, the City of Riverside sent out SB 18 consultation notices to Tribes. No Tribes requested to consult with the City pursuant to SB 18. The Soboba Band of Luiseno Indians and Aegua Caliente Band of Cahuilla Indians agreed with the City's proposed mitigation measures described below in Section 5.5.7 as mitigation measures MM CUL-1 through MM CUL-4.

**Section 5.18, Tribal Cultural Resources, p. 5.18-8 is revised as follows:**

The City and the Soboba Band of Luiseno Indians and Aegua Caliente Band of Cahuilla Indians agreed that, in the event of the inadvertent discovery of previously unknown cultural resources of tribal or Native American importance during construction activities, appropriate mitigation measures would be implemented and followed. The Soboba Band of Luiseno Indians and Aegua Caliente Band of Cahuilla Indians accepted the City's

standard mitigation measures (**MM CUL-1** through **MM CUL-4**), to ensure that potential impacts in the event of an inadvertent discovery of resources remain at less than a significant level. Therefore, potential Project impacts to tribal cultural resources would be **less than significant with mitigation measures MM CUL-1 through MM CUL-4**.

**Section 6.0, Other CEQA Topics, p. 6.0-1 is revised as follows:**

This section analyzes the Project's consistency with regional plans, potential irreversible environmental effects, and growth-inducing impacts of the proposed Project.

**Section 6.1, Consistency with Regional Plans, p. 6.0-4 is revised as follows:**

Estancia, located at 7871 Mission Grove Parkway South, consists of 208 units and has a density of 17-3 du/ac.

**Section 7.0.1, Project Objectives, p. 7.0-1 is revised as follows:**

1. Provide a high-quality residential development in close proximity to many existing amenities and transit corridors.
2. Increase the type and amount of housing available, consistent with the goals of the City's Housing Element.
3. 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.
4. Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
5. Identify mixed use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
6. In furtherance of the City's Climate Action Plan, replace ~~aging~~ older building construction with newer and more green building practices and other sustainable development methods.
7. Create a mixed-use environment encouraging walkability.
8. Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complimentary with the existing surrounding residential built environment in terms of colors and materials and landscaping.

**Section 7.0.3, Alternative 1 - No Project/ No Redevelopment, p. 7.0-9 is revised as follows:**

**Relationship to Project Objectives**

Alternative 1, the No Project/No Redevelopment Alternative, assumes that no redevelopment or disturbance of the 9.92-acre site would occur, leaving the 104,231-square-foot vacant retail building (formerly a K-Mart store) and associated parking lot in their current condition. While this alternative would reduce certain short-term environmental impacts related to construction, it would not fulfill any of the Project's objectives.

Although the No Project/No Redevelopment Alternative would avoid potential construction-related impacts, it would not contribute to meeting the City of Riverside's housing needs. Specifically, Alternative 1 would not provide high-quality residential development in proximity to existing amenities and transit corridors (Project Objective 1), nor would it assist the City in meeting its housing demand (Project Objectives 2 & 3), as no housing units would be constructed. The site would remain an underutilized vacant property, which does not align with the objective of using land resources more efficiently through infill redevelopment (Project Objectives 4 & 5). Furthermore, the alternative would not incorporate any green building practices or sustainable development methods (Project Objective 6), meaning it would not support the City's RRG-CAP goals.

Additionally, Alternative 1 would continue to leave the site without any cohesive integration of uses, as no mixed-use development would be pursued (Project Objective 7). The vacant retail building would remain in place with only temporary and seasonal tenants, such as the Spirit Halloween store, and would not contribute to creating a mixed-use environment that promotes walkability or enhances the aesthetic quality of the area (Project Objectives 7 & 8). The existing structure, built in 1991, would not be updated or improved, meaning it would not provide any enhanced residential architecture or design elements compatible with the surrounding residential neighborhoods.

State CEQA Guidelines Section 15126.6(f)(1) states that factors such as site suitability and economic viability may be considered when assessing the feasibility of alternatives. In this case, Alternative 1 would not meet any of the key objectives, including providing housing to meet the City's Regional Housing Needs Assessment (RHNA) allocations (Project Objective 2 & 3), improving the site's land use efficiency, or contributing to sustainable development goals. Without redevelopment, the site would continue to remain vacant, failing to contribute to the City's housing goals or economic growth.

Therefore, Alternative 1 does not fulfill any of the Project's objectives (Project Objectives 1-8) and is not considered a feasible alternative. It would perpetuate the underutilization of a prime urban site and fail to address the City's need for housing and sustainable development. As a result, Alternative 1 is rejected as an infeasible option.

#### Finding

Alternative 1 (No Project/No Redevelopment) is infeasible and does not fulfill the project objectives (Project Objectives 1-8). CEQA does not require a lead agency to select an alternative which does not meet most of the project objectives (State CEQA Guidelines section 15126.6).

**Section 7.0.4, Alternative 2 – Reduced Density Apartment Redevelopment, p. 7.0-9 is revised as follows:**

This discussion analyzes alternative redevelopment of the site with a high-quality residential development with a reduced residential density, such that it meets the residential density criteria of the C2 Compatibility Zone of the March Air Reserve Base/ Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). The residential density standard for the C2 zone is six or less dwelling units per acre (du/ac). As the Project site is 9.92 acres, in order to meet the C2 zone residential density criteria of 6.0 du/ac, only 58 dwelling units would be constructed.

**Section 7.0.4, Alternative 2 – Reduced Density Apartment Redevelopment, p. 7.0-15 is revised as follows:**

**Relationship to Project Objectives**

Alternative 2, the Reduced Density Apartment Redevelopment, proposes developing the Project site with 58 dwelling units, consistent with the residential density criteria for Compatibility Zone C2 of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). While this alternative would reduce some environmental impacts compared to the proposed Project, it would only partially meet most of the Project's objectives (meet Project Objectives 1, 2, 6, 7, and 8) and fails to meet two key objectives (Project Objectives 3 & 4).

First, while Alternative 2 would provide a high-quality residential development, the significantly reduced density would not maximize the residential potential of the site (Project Objective 3). The proposed Project aims to construct 347 dwelling units, a scale that would meaningfully contribute to the City's housing supply. In contrast, the 58 dwelling units under Alternative 2 would provide only a fraction of the housing needed to meet the City's projected housing demand and goals outlined in the Housing Element. As such, Alternative 2 would not effectively assist the City of Riverside in meeting its housing needs or its RHNA allocations.

Additionally, although this alternative would still redevelop an underutilized vacant site, the reduced density would represent a less efficient use of the land resources. The Project's objective of promoting well-planned infill redevelopment is best met by maximizing the site's potential (Project Objective 3), which Alternative 2 fails to do. Furthermore, the smaller-scale development under Alternative 2 would not create a mixed-use environment that encourages walkability (Project Objective 7) to the same degree as the proposed Project, which is designed to support a vibrant, pedestrian-friendly community through higher density and mixed-use integration.

Although the Reduced Density Apartment Redevelopment would still include green building practices and sustainable development methods in alignment with the City's RRG-CAP (Project Objective 6), the smaller number of units would limit the extent of

environmental benefits, such as energy efficiency and reduced greenhouse gas emissions, that could be achieved with a larger residential development.

State CEQA Guidelines Section 15126.6(f)(1) allows for consideration of factors like site suitability and economic viability in assessing the feasibility of alternatives. While Alternative 2 would meet the residential density requirements of Compatibility Zone C2, it would not provide the needed level of housing supply, use land resources as efficiently as possible, or create the mixed-use, walkable environment envisioned for the site. The reduced scale of development would also limit the architectural and aesthetic enhancements that could be achieved through a larger, more cohesive project design. Alternative 2 would only partially meet Project Objectives 1, 2, 6, 7, and 8. Alternative 2 would not meet Project Objectives 3 and 4

#### Finding

Alternative 2 would result in fewer impacts for certain environmental issues, such as air quality, noise, and vehicle miles traveled, compared to the proposed Project due to the reduced number of dwelling units. However, Alternative 2 is rejected as a proposed Project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) failure to meet key Project objectives, particularly maximizing the residential potential of the site and providing a significant contribution to the City's housing needs; and (2) infeasibility, as this alternative would underutilize a key infill site and not meet the City's long-term planning and housing goals.

### **Section 7.0.5, Alternative 3 – Retail Development, p. 7.0-22 is revised as follows:**

#### **Relationship to Project Objectives**

Alternative 3, the Retail Development Alternative, proposes retaining the existing 104,231-square-foot retail building and associated surface parking lot with minor improvements for a new permanent retail tenant. While this alternative would be consistent with the current land use and zoning designations, it would not meet most of the proposed Project's objectives.

This alternative does not support the objective of providing high-quality residential development (Project Objective 1). Instead of delivering much-needed housing units, Alternative 3 would continue to dedicate the site to retail uses, failing to contribute to the City's housing stock or assist in meeting the City's RHNA allocations (Project Objectives 2 & 3). The Project's objective of increasing the type and amount of available housing would not be met, as no residential development is proposed under this alternative.

Although Alternative 3 would continue the commercial use of the site, it does not support the goal of using land resources more efficiently by providing infill redevelopment on an underutilized vacant site (Project Objective 4). The objective of transforming an underutilized vacant site through well-planned infill redevelopment would not be met. In contrast, the proposed Project would bring new housing units to the area, optimizing the

use of the land for residential purposes and contributing to the City's growth and housing goals.

This alternative would also fail to advance the City's RRG-CAP, which aims to promote green building practices and sustainable development methods (Project Objective 6). The retention of the aging retail building with only minor improvements would not incorporate the modern green building practices that the proposed Project would employ, such as energy-efficient design and construction techniques, further diminishing the site's potential to contribute to sustainability goals.

Furthermore, Alternative 3 would not create the mixed-use environment envisioned for the site, nor would it encourage walkability or provide enhanced residential architecture (Project Objectives 1 & 7). The continued use of the site for retail would offer little to no improvement to the walkability of the area or promote a more cohesive integration of mixed-use development (Project Objective 8).

State CEQA Guidelines Section 15126.6(f)(1) states that factors such as site suitability and economic viability may be considered when assessing the feasibility of alternatives. While Alternative 3 would retain the existing retail structure and align with the current zoning, it would not meet the key Project objectives of providing high-quality housing, maximizing the site's residential potential, or using land resources efficiently. Additionally, it would not contribute to the City's long-term goals for housing, climate action, or sustainable development.

Thus, although Alternative 3 would have fewer construction impacts, it would not fulfill any of the Project's objectives and is not considered feasible in achieving the overall goals of the proposed development.

#### Finding

Alternative 3 would result in fewer environmental impacts related to construction activities, such as air quality, greenhouse gas emissions, and noise, but would generate greater operational impacts related to transportation and vehicle emissions due to higher trip generation. Alternative 3 is rejected as a proposed Project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) inability to avoid environmental impacts; (2) failure to meet the Project's objectives (Project Objectives 1-8), including providing high-quality residential development and addressing the City's housing needs; and (3) infeasibility, as this alternative would continue the underutilization of the site for retail purposes and not contribute to the City's goals for housing and sustainable land use.

**Section 7.0.6, Alternative 4 – Proposed Project at Off-Site Location, p. 7.0-27 is revised as follows:**

#### **Relationship to Project Objectives**

Alternative 4, the Proposed Project at Off-Site Location, assumes that the proposed 347-unit residential apartment project would be constructed at a different site of similar size within the City of Riverside. This alternative does not specify an exact off-site location but



assumes that the project would involve redeveloping a vacant or underutilized site of similar size.

While this alternative could still provide high-quality residential development in the City of Riverside, it may not necessarily be located in close proximity to existing amenities and transit corridors (Project Objective 1), as is the case with the proposed Project site. The convenience and access to services, which are integral to the Project's objective of providing a transit-oriented, walkable environment, may not be available at an off-site location. Without a specific site, it cannot be determined if this objective could be partially or fully met.

Similarly, while Alternative 4 would still provide 347 residential units and contribute to meeting the City's housing needs, the off-site location may not maximize the residential potential of the site (Project Objective 3) as efficiently as the proposed Project does. The current Project site represents an underutilized infill site, which is an optimal location for high-density residential development. An alternative site may not provide the same efficient use of land resources. Without a specific site, it cannot be determined if this objective could be partially or fully met.

Additionally, Alternative 4 may not support the objective of creating a mixed-use environment that encourages walkability. The success of mixed-use environments relies heavily on the context and surrounding uses, and there is no guarantee that an off-site location would integrate well into a mixed-use framework. Without the specific location, it cannot be determined if the project objective of creating a mixed-use environment encouraging walkability (Project Objective 7) could be partially or fully met.

State CEQA Guidelines Section 15126.6(f)(1) allows for consideration of factors such as site suitability and economic viability. In this case, the off-site alternative could theoretically meet many of the same objectives as the proposed Project, but without a specific location, there are uncertainties regarding site suitability, land use efficiency, and overall feasibility. Additionally, the off-site location may not provide the same strategic advantages in terms of transit access, walkability, and integration with existing land uses, limiting its ability to meet most or all the Project's objectives. The City is not aware of another site that is comparable in size and is currently available for redevelopment, the developer does not own or control such another site, nor is it certain the developer can acquire such a site.

#### Finding

Without a specific location for Alternative 4 it cannot be determined if there would be less environmental impacts than the proposed Project. The City is not aware of another site that is comparable in size and is currently available. Alternative 4 is rejected as a proposed Project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) inability to avoid environmental impacts; (2) failure to partially or fully meet most of the Project's objectives; and (3) infeasibility, as no specific alternative site is currently available.

**Section 8.0, List of Preparers, p. 8.0-1 is inserted as follows:****8.0 List of Preparers****Lead Agency, City of Riverside**

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Brian Norton, Principal Planner

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**3.2 New Final EIR Appendices**

Appendix K – Mission Grove Neighborhood Alliance Comment Letters

Appendix L – WMWD Will Serve Letter

Appendix M – Riverside County ALUC Staff Report

Appendix N – City of Riverside Fire Department Letter

Appendix O – Johnson Aviation Consulting Tech Memo