


Airport

City of Arts & Innovation

MEMORANDUM

September 12, 2019

From: Kim Ellis, Airport Manager

To:  Carl Carey, Director, General Services Department

Subject: Riverpointe PRD Appeal to Overrule Riverside County Airport Land Use Determination of Inconsistency

Dear Mr. Carey,

The following are my comments supporting the Riverside County Airport Land Use Commission (ALUC) determination that the proposed development at the intersection of Jurupa Avenue and Tyler Street are inconsistent with the City of Riverside Airport Land Use Compatibility Plan.

This item is scheduled to be heard by City Council on October 1, 2019. I have been invited to make a presentation to the City Council detailing my opposition to the planned development. My presentation will be made in concert with the presentation made by the Community Economic Development Department.

Comments to proposed development:

The opening statement in the developer's appeal letter places emphasis on "public safety". As drawn from the Riverside County ALUC Plan, which is guidance taken directly from the State of California guidelines on developing zones in the Airport Influence Area (AIA), page 3-16:

The zoning determination is not random, but based on statistical analysis of accidents that occur near airports...

The following references the paragraph numbering in the developers appeal document:

- a) Noise: a resident from the proposed development area commented that they do experience noise from aircraft.



- b) Proposer states that the Airport Master Plan **requires** departing traffic to turn northwesterly to follow the Santa Ana River. The Master Plan actually states on page 1-23 that the traffic patterns were established as part of the Airport's Code of Federal Regulations, Part 150, Noise Compatibility Study, and are "**recommended** (emphasis added) traffic patterns to minimize noise impacts on neighboring noise-sensitive land uses". Discussion with local air traffic control representatives indicate departing traffic headed west continue straight out and do not turn as recommended.
- c) The homes referenced in the appeal are "grandfathered" under previous zoning plans, or before ALUC established any zoning requirements in those areas. It should be emphasized that if those same areas were vacant today, and a developer asked to build those homes, their request would be found inconsistent.
- d) The proposed development is not consistent with the surrounding housing. The density proposed is significantly greater. Also, see comment c) above. Re: the reference to the easterly project: that development was under a different ALUC plan.
- i) Statement in proposer's letter says "a very limited number of flights MAY fly above the project site..." Under the conditions in the statement, all aircraft on an instrument approach from the west MUST fly over the area to follow the instrument landing system signals when landing at the airport.
- j) The roadway suggested by the proposer for use by aircraft for an emergency landing does not meet the required dimensions as indicated in the appeal document. Jurupa is a four-lane street with a raised center median, with each direction of traffic approximately only 35 feet wide. Question: are there any improvements planned for the street that would install light poles, etc.

At the Planning Commission meeting on March 14, 2019, the Developer used the term "clustering" in reference to how the housing units are grouped, basically in groups of four units. By the Developers own statements, the project does not meet the requirements established by ALUC. In paragraph (2) below, the density exceeds the ALUC guidance; additionally, the development lies directly in line with the extended runway centerline.

The following information is taken directly from the State ALUC planning document:

"3.2.1 (c) To be consistent with the *Compatibility Plan*, a general plan and/or implementing ordinance also must include provisions ensuring long-term compliance with the compatibility criteria.

"4.2.5. *Limitations on Clustering*: Policy 4.2.4(d) notwithstanding, limitations shall be set on the maximum degree of clustering or usage intensity acceptable within a portion of a large project site. These criteria are intended to limit the number of people at risk in a concentrated area.

- (a) Clustering of new residential development shall be limited as follows:
- (1) Within *Compatibility Zone A*, clustering is not applicable.
 - (2) Within *Compatibility Zones B1, B2, and C*, no more than 4 dwelling units shall be allowed in any individual acre. Buildings shall be located as far as practical from the extended runway centerline and normal aircraft flight paths. (The developer proposes 56 housing unit in slightly more than 7 acres.)
 - (d) In no case shall a proposed development be designed to accommodate more than the total number of dwelling units per acre (for residential uses) or people per acre (for nonresidential uses) indicated in Table 2A times the gross acreage of the project site. (This total is 11.2 units per acre. Developer proposes 56 units.)

With regards to protecting an airport from encroachment, a report from the North Central Texas General Aviation and Heliport System Plan states on page 6, that "Since 1981, an average of 262 airports per year have closed throughout the United States. These closures occur for a variety of reasons, including urban encroachment".

For local examples, one need only look at Santa Monica Airport, in the process of closing, and Rialto Airport - closed. French Valley Airport was built to replace Rancho California Airport in the late 1980's. Currently, French Valley Airport is experiencing serious encroachment from development and the residents are exposed to significant aircraft noise.

This project should not be approved so as to go backwards with the City's public safety planning efforts. Even though surrounding homes do not meet current standards, that should not be the rationale for justifying this project and continue the practice of land use that is inconsistent with the adopted Airport Land Use Compatibility Plan.

Approval of this project will only make conditions worse in the event of an aircraft accident. If an aircraft goes down in the surrounding homes, 2-3 homes could be impacted as evidenced by the accident on Streeter Ave recently. If an aircraft goes down in the proposed development the minimum number of homes impacted would be 4 based on the developers "clustering".

In summary, this project does not meet density limitations, is not offset from the extended runway centerline, and adjacent open space is not available.

Respectfully,



Kim A. Ellis, A.A.E
Airport Manager
Riverside Municipal Airport