

**Kopaskie-Brown, Mary**

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**From:** Carmen <sweetcr2004@yahoo.com>  
**Sent:** Sunday, February 21, 2021 10:46 AM  
**To:** Conder, Chuck; info@responsiblegovernmentriverside.com  
**Subject:** [External] Don't Crowd Us, Please!

Mr. Conder: I'm very concerned about proposed growth in Riverside. If you could please respond with your plan to limit the proposed HUGE growth, I would sincerely appreciate it. Grateful Thanks.

Sent from my iPhone

**Kopaskie-Brown, Mary**

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**From:** Joe Gil <gil\_joe@yahoo.com>  
**Sent:** Sunday, February 21, 2021 10:38 AM  
**To:** Conder, Chuck; info@responsiblegovernmentriverside.com  
**Subject:** [External] Don't Crowd Us, Please!

Mr. Conder: I'm very concerned about proposed growth in Riverside. If you could please respond with your plan to limit the proposed HUGE growth, I would sincerely appreciate it. Grateful Thanks.

Sent from my iPhone

**Kopaskie-Brown, Mary**

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**From:** nowwhitefenders@yahoo.com  
**Sent:** Sunday, February 21, 2021 11:44 AM  
**To:** Conder, Chuck; info@responsiblegovernmentriverside.com  
**Subject:** [External] Don't Crowd Us, Please!

Mr. Conder: I'm very concerned about proposed growth in Riverside. If you could please respond with your plan to limit the proposed HUGE growth, I would sincerely appreciate it.

Grateful Thanks.

Robert

Sent from my iPhone XI Plus

**Kopaskie-Brown, Mary**

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**From:** tracy barnes <t\_adamson@sbcglobal.net>  
**Sent:** Monday, February 22, 2021 8:48 AM  
**To:** Conder, Chuck; info@responsiblegovernmentriverside.com  
**Subject:** [External] Don't Crowd Us, Please!

Mr. Conder: I'm very concerned about proposed growth in Riverside. If you could please respond with your plan to limit the proposed HUGE growth, I would sincerely appreciate it. Grateful Thanks.

Tracy Barnes



## Kopaskie-Brown, Mary

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**From:** Kerry Smith <Kerry.Smith@sce.com>  
**Sent:** Thursday, February 25, 2021 9:59 AM  
**To:** Conder, Chuck  
**Cc:** Rosemarie Smith  
**Subject:** [External] High Density - Low Income Tenants in Riverside

Mr. Conder,

Please do not let the politicians at our State Capita force the City of Riverside to permit developers to place between 18,000 to 22,000 high-density low income tenants. This problem should have been resolved years ago. It is not good for our city to create housing that will increase crime rates and allow these tenants to use drugs and alcohol unabated. It will also cause overcrowding, traffic congestion, diminish local jobs, and also damage our Riverside neighborhoods and our Riverside quality of life.

Thank You,  
Kerry and Rose

Kerry L. Smith  
SCE Incident and Problem Management  
IT Outsourcing Mgmt, Sr Advisor  
Service Management Office & Operations  
Office: 626-543-8976  
Cell: 626-260-2859



From: rania safi <[yayaranja@gmail.com](mailto:yayaranja@gmail.com)>  
Sent: Thursday, March 18, 2021 7:35 AM  
To: Andrade, Frances <[FANDRADE@riversideca.gov](mailto:FANDRADE@riversideca.gov)>  
Subject: [External] Public comment

What type of incentives will be offered to developers to encourage mixed income housing?

March 22, 2021

Mr. Matthew Taylor  
Senior Planner  
City of Riverside  
Community and Economic Development Department - Planning Division  
3900 Main Street, 3rd Floor  
Riverside, CA 92522

**Riverside Housing Element Update: Comments on Draft Preferred Alternative Opportunity Sites Inventory and Proposed Zoning**

Dear Mr. Taylor:

We are the owners of the 14.4-acre property, located on the northeast corner of Kansas and Massachusetts Avenues (the "Property"). We appreciate the opportunity to comment on the City's draft Preferred Alternative Opportunity Sites Inventory and Proposed Zoning.

We support the City's efforts to update its Housing Element and provide housing for people of all income levels and needs. We are concerned, however, about the proposed action to designate our Property as a preferred alternative for future residential housing.

As you are aware, the Property is zoned General Industrial (I) and is surrounded by active industrial uses that will continue in the future. Introducing homes among industrial uses will generate both compatibility and environmental justice concerns.

Equally important, the Property is presently being investigated and remediated for hazardous materials contamination, primarily volatile organic compounds, in the soil, soil vapor and groundwater, under the oversight of the California Regional Water Quality Control Board (Water Board). Notably other properties in the immediate area have also gone through similar investigations and remediations underscoring the heavy industrial uses associated with the area.

Since the site was purchased in 2013, the Property owners have been working with the Water Board to complete characterization and remediate existing contamination on the site. That work is focused on remediating the site to achieve commercial and industrial use standards, consistent with underlying zoning.

A critical component of the remediation plan is to restrict the site's future use to commercial and industrial uses to protect human health and the environment, consistent with California Civil Code Section 1471. Sensitive uses, such as residential, schools, hospitals and day care centers, will be restricted. For all these reasons, zoning

Mr. Matthew Taylor  
March 22, 2021  
Page 2

the site as residential will result in a zoning designation for uses that are incompatible with the property's current and anticipated future environmental condition.

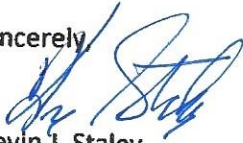
Additionally, the General Plan Land Use and Urban Design Element states that an important Citywide goal is to preserve industrial land and avoid encroachments of incompatible land uses within proximity of industrial land (e.g., see Land Use and Urban Design Element LU-24 and LU-25.) The contemplated action would conflict with this important goal, further reduce the City's limited supply of industrial land, and jeopardize the already delicate jobs-housing balance that requires industrial areas to generate local employment opportunities.

In summary, we request that the Property be removed from consideration for future residential housing. Such proposed zoning is not consistent with existing conditions and ongoing remedial efforts.

We are looking forward to developing a first-class industrial project that is consistent with the environmental condition of the site, provides a significant upgrade to the existing improvements and respects the in-place zoning for the property and the surrounding neighborhood.

Thank you very much for your consideration, and please let us know if we can be of assistance in this request.

Sincerely,



Kevin J. Staley  
Managing Partner

cc: Mary Kopaskie-Brown, Community & Economic Development Director

**From:** [Elizabeth Pinney Muglia](#)  
**To:** [Taylor, Matthew](#)  
**Cc:** [Janice Rooths](#); [Maribel Nunez](#); [Jeff Green](#); [Damien O'Farrell](#); [Ashton Davis](#); [Freya Foley](#); [Tanya Humphery](#); [janet.b@ccaej.org](#); [Ana Gonzalez](#); [Murray, David](#); [Kopaskie-Brown, Mary](#)  
**Subject:** Re: [External] Re: 4/22/21 Workshop - Request  
**Date:** Thursday, April 22, 2021 3:42:21 PM  
**Attachments:** [image001.png](#)

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Hi Matt,

Thanks for all your work!

Maribel asked me to give you a heads up on some of the EJ questions or comments that may come up tonight. I know some are sensitive, especially around the voter approved initiatives.

- What policies currently exist that address environmental justice (EJ), particularly related to air and water quality in disadvantaged communities?
- What tools are used to identify EJ disadvantaged communities?
- How are existing policies compared to advocacy group recommendations or similar policies in other jurisdictions?
- What mechanism or department is in place to enforce EJ policies?
- Are there plans to have a public meeting with a review of EJ efforts in the city?
- Recommendation: Mark on a map any sites in the city that are contaminated and ensure the proposed sites are not in proximity/have proper buffer
- Recommendation: Use CalEnviroScreen to map EJ communities and consider zoning overlays to prevent future industrial uses in these communities and protect the residents from further degradation of air quality and built environment.
- Question: In order to address limitations in broad swaths of Ward 4, consider reviewing Prop R and Measure C - are these truly being used agriculturally or protecting wealthy communities by protecting the practice of exclusionary zoning? Could SB 330 be used as an opportunity to open up some areas for multifamily zoning in these voter approved "moratoriums" on multifamily housing uses?
- Recommendation: More city engagement/initiative to fund (bring state funds and appropriate city funds) additional public transit and expansion of transit corridors so that spreading housing doesn't lead to isolated low income communities for those without cars and also doesn't continue to have a sprawl effect that creates more vehicle traffic and air pollution.

We look forward to the workshop!

--

Liz Pinney-Muglia (she/her)  
Policy Director

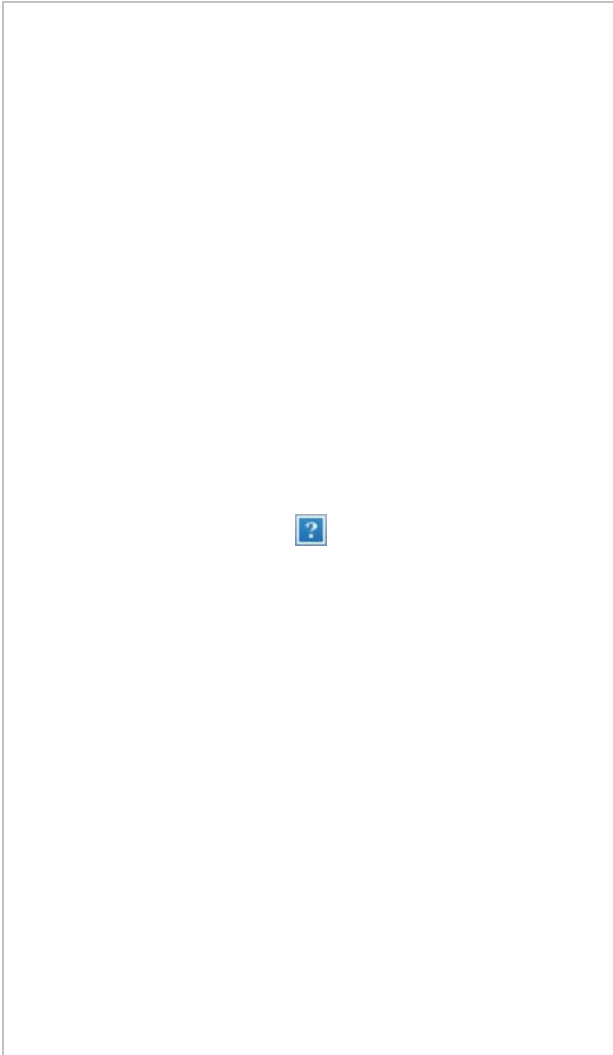
Center for Community Action and Environmental Justice

C: (951) 543-1740 | E: [elizabeth.m@ccaej.org](mailto:elizabeth.m@ccaej.org) | W: <https://www.ccaej.org>

On Thu, Apr 22, 2021 at 10:29 AM Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)> wrote:

| Good morning Janice

We have updated the [3D WebMap](#) of our Housing Opportunity Sites to include some of the additional information as you suggested:



For this evening's meeting, we will be focused on discussing the Environmental Impact Report process and topics of analysis; however, if time allows, we may be able to pull these maps up to share for discussion purposes. If not, we will be announcing a series of events in the coming months where we can focus on these maps and related themes more intently.

I hope this is helpful – please let me know if you have any further questions. Thank you!

**Matthew Taylor | Senior Planner**

951.826.5944 | [mtaylor@riversideca.gov](mailto:mtaylor@riversideca.gov)

**City of Riverside**

Community & Economic Development Department

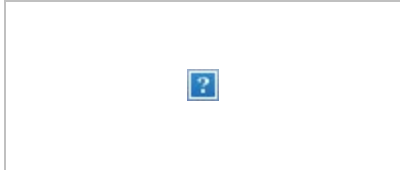
*Planning Division*

3900 Main Street | 3<sup>rd</sup> Floor | Riverside 92522

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**From:** Janice Rooths <[antiracistriverside@gmail.com](mailto:antiracistriverside@gmail.com)>  
**Sent:** Wednesday, April 21, 2021 9:45 AM  
**To:** Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)>  
**Cc:** Maribel Nunez <[maribel@inlandequitypartnership.org](mailto:maribel@inlandequitypartnership.org)>; Jeff Green <[jeffgreen.cap@gmail.com](mailto:jeffgreen.cap@gmail.com)>; Elizabeth.m@ccaej.org; Damien O'Farrell <[damien@parkviewlegacy.org](mailto:damien@parkviewlegacy.org)>; Ashton Davis <[ashton@adavis.me](mailto:ashton@adavis.me)>; Freya Foley <[ffoley7955@aol.com](mailto:ffoley7955@aol.com)>; Rose mayes <[rosemayes@fairhousing.net](mailto:rosemayes@fairhousing.net)>; Tanya Humphery <[tanya.farmgirl@gmail.com](mailto:tanya.farmgirl@gmail.com)>; janet.b@ccaej.org; Ana Gonzalez <[ana.g@ccaej.org](mailto:ana.g@ccaej.org)>  
**Subject:** Re: [External] Re: 4/22/21 Workshop - Request

Thanks Matt! We know it's a good deal of work but would certainly bring significant value to the table for us all. I have Human Relations Commission tomorrow but looking forward to a good workshop no less!!!



***Our Mission is to Empower Individuals, Organizations, & Communities to Eliminate Racism***

On Wed, Apr 21, 2021 at 9:36 AM Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)> wrote:

Hi Janice and Maribel

We are looking into some options for this. Thank you for the suggestion!

**Matthew Taylor | Senior Planner**

951.826.5944 | [mtaylor@riversideca.gov](mailto:mtaylor@riversideca.gov)

**City of Riverside**

Community & Economic Development Department

*Planning Division*

3900 Main Street | 3<sup>rd</sup> Floor | Riverside 92522

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**From:** Maribel Nunez <[maribel@inlandequitypartnership.org](mailto:maribel@inlandequitypartnership.org)>  
**Sent:** Tuesday, April 20, 2021 7:35 PM  
**To:** Janice Rooths <[antiracistriverside@gmail.com](mailto:antiracistriverside@gmail.com)>  
**Cc:** Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)>; Jeff Green <[jeffgreen.cap@gmail.com](mailto:jeffgreen.cap@gmail.com)>; Elizabeth.m@ccaej.org; Damien O'Farrell <[damien@parkviewlegacy.org](mailto:damien@parkviewlegacy.org)>; Ashton Davis <[ashton@adavis.me](mailto:ashton@adavis.me)>; Freya Foley



<[ffoley7955@aol.com](mailto:ffoley7955@aol.com)>; Rose mayes <[rosemayes@fairhousing.net](mailto:rosemayes@fairhousing.net)>; Tanya Humphery <[tanya.farmgirl@gmail.com](mailto:tanya.farmgirl@gmail.com)>; [janet.b@ccaej.org](mailto:janet.b@ccaej.org); Ana Gonzalez <[ana.g@ccaej.org](mailto:ana.g@ccaej.org)>

**Subject:** [External] Re: 4/22/21 Workshop - Request

I want to include CCAEJ in the email thread

Maribel

On Tue, Apr 20, 2021, 7:22 PM Janice Rooths <[antiracistriverside@gmail.com](mailto:antiracistriverside@gmail.com)> wrote:

Hi Matt,

I don't know if you're doing this already but we were wondering if you will have the <https://oag.ca.gov/environment/sb1000> CalEnviroScreen Pollution Indicator Maps overlaid on our current RHNA map for the workshop on 4/22. It would certainly be helpful for us. Thanks so much!

Thrive!

Janice



***Our Mission is to Empower Individuals, Organizations, & Communities to Eliminate Racism***

Keep Riverside healthy: Wear a face covering, maintain healthy diet and exercise, wash your hands, and get vaccinated. [RiversideCA.gov/COVID-19](https://RiversideCA.gov/COVID-19)



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**From:** Janice Rooths <[antiracistriverside@gmail.com](mailto:antiracistriverside@gmail.com)>

**Sent:** Monday, May 3, 2021 6:09 AM

**To:** Edwards, Erin <[EEwards@riversideca.gov](mailto:EEwards@riversideca.gov)>; Melendrez, Andy <[ASMelendrez@riversideca.gov](mailto:ASMelendrez@riversideca.gov)>; Plascencia, Gaby <[GPlascencia@riversideca.gov](mailto:GPlascencia@riversideca.gov)>

**Cc:** Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)>; Zelinka, Al <[azelinka@riversideca.gov](mailto:azelinka@riversideca.gov)>

**Subject:** [External] Housing Element Change Requests for Consideration in Committee 5/3/21

From: Antiracist Riverside in solidarity with Inland Equity Partnership, Center for Community Action & Environmental Justice, and Other Community Members

To: Housing & Homelessness Committee Members:

We are concerned about racial and economic segregation in the City of Riverside particularly the concentration of whites and wealth in Ward 4, how current zoning, policies, & designated transportation corridors in the Housing Element perpetuate the racial and economic segregation while ensuring density does not increase in Ward 4, and how the focus of this housing element should be developing the types of housing options that build wealth for those who will live in the housing especially very low through middle income residents.

The following are requested changes that we believe should be included in the Housing Element plans as well as the Inclusionary Housing policy:

=Explore recent legislation that would provide zoning flexibility like SB 330 "Housing Crisis Act" to address limitations in broad swaths of Ward 4 - if so, consider reviewing Prop R and Measure C - are these truly being used agriculturally or protecting wealthy communities by protecting the practice of through exclusionary zoning.

=Need to move past density being equated to affordable housing. This is using the state's density descriptor of affordability. When projects are being considered, Density bonuses are used for incentives. In seeing higher density housing projects, will not always translate as a marker for affordability. After the opportunity sites zoning, the city creates policies and selects priority projects that lead to permanent affordability housing like co ops, community land trust.

=Look for funding (including from city budget) to go to RTA for as many lines as possible at 15 minute service or better. Additional stops would be the secondary ask.

=Goal is to create frequent service on more transportation corridors throughout the city that can open for more RHNA zoning throughout the city (including Ward 4)

=Eliminate single family zoning, we are running out of space as our population grows!

=Strengthen a rent control ordinance far beyond Costa-Hawkins.

=We need the city to play an active role for its residents to build community wealth that translates to permanent affordability housing projects (co-ops, community land trust, condos and etc).

cc Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
DCM  
C&ED Director

=The city needs to incentivize and remove barriers for housing zoning and development. Existing in-leiu and density bonus incentives are optional and ineffective. Affordable set asides should be mandatory at least 25% and any fees collected should be directed to subsidizing affordable housing and neighborhood improvements in areas with existing affordable housing that is concentrated or segregated from higher income neighborhoods.

=To make sure houses get built, incentivize developers by lowering fees for on site construction and increasing fees for off site construction. Fees that come from off site construction should be restricted funds to build affordable housing.

=Stop concentration of poverty—mixed-income housing/inclusionary zoning is the best approach, 75% market rate and 25% affordable requirement should be the standard

=Existing warehousing and logistics regulation to protect residential and public spaces from negative effects of industrial uses don't go far enough - the setback standards for warehouses and logistics abutting residential zones and public facilities aren't even 300 feet - a good standard would be 1,000 feet

=Use CalEnviroScreen to map Environmental Justice communities and consider zoning overlays to prevent future industrial uses in these communities and protect the residents from further degradation of air quality and built environment.

Thank you for your attention to this matter.

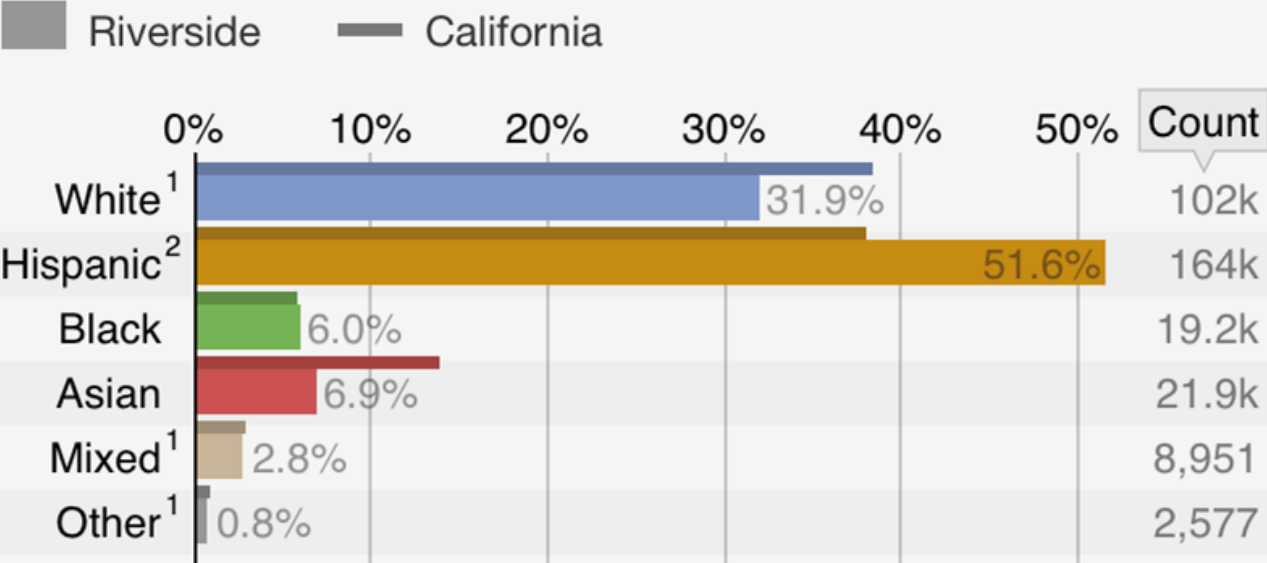
In Solidarity for a Better Riverside!



***Our Mission is to Empower Individuals, Organizations, & Communities to Eliminate Racism***

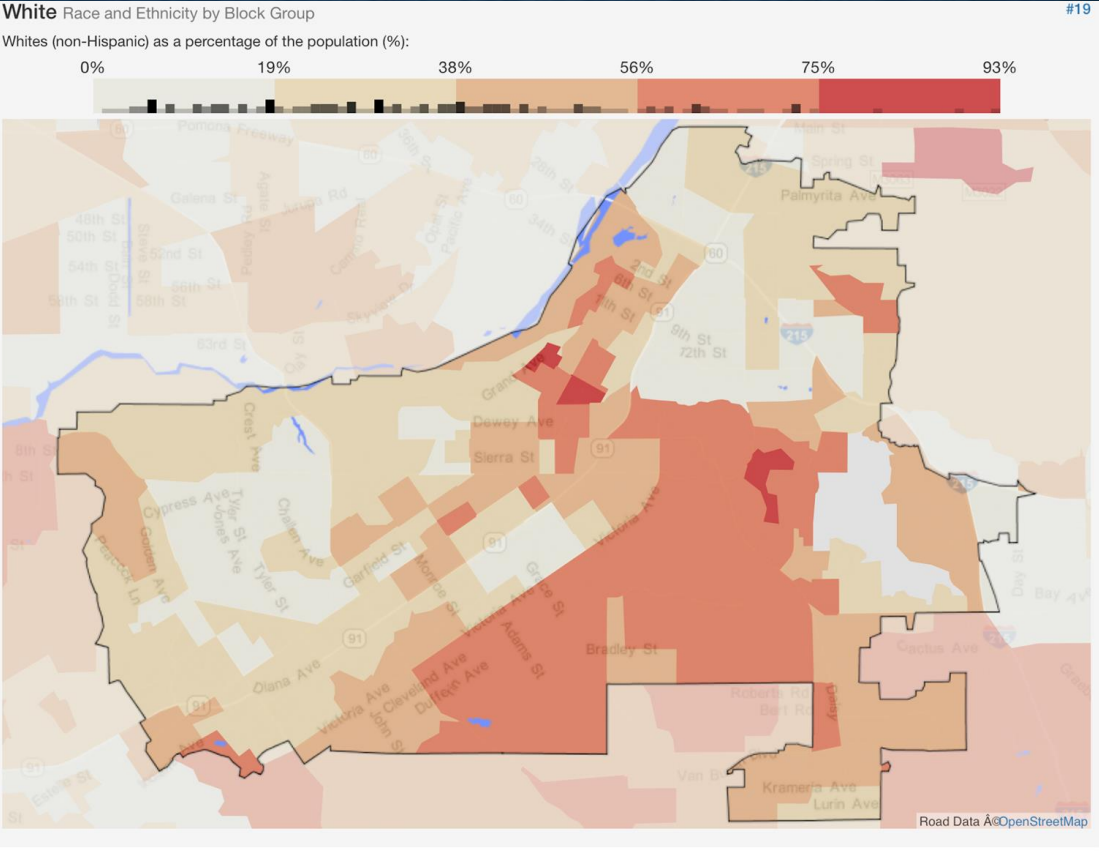
# Race and Ethnicity

Percentage of the total population.  
Scope: population of California and Riverside

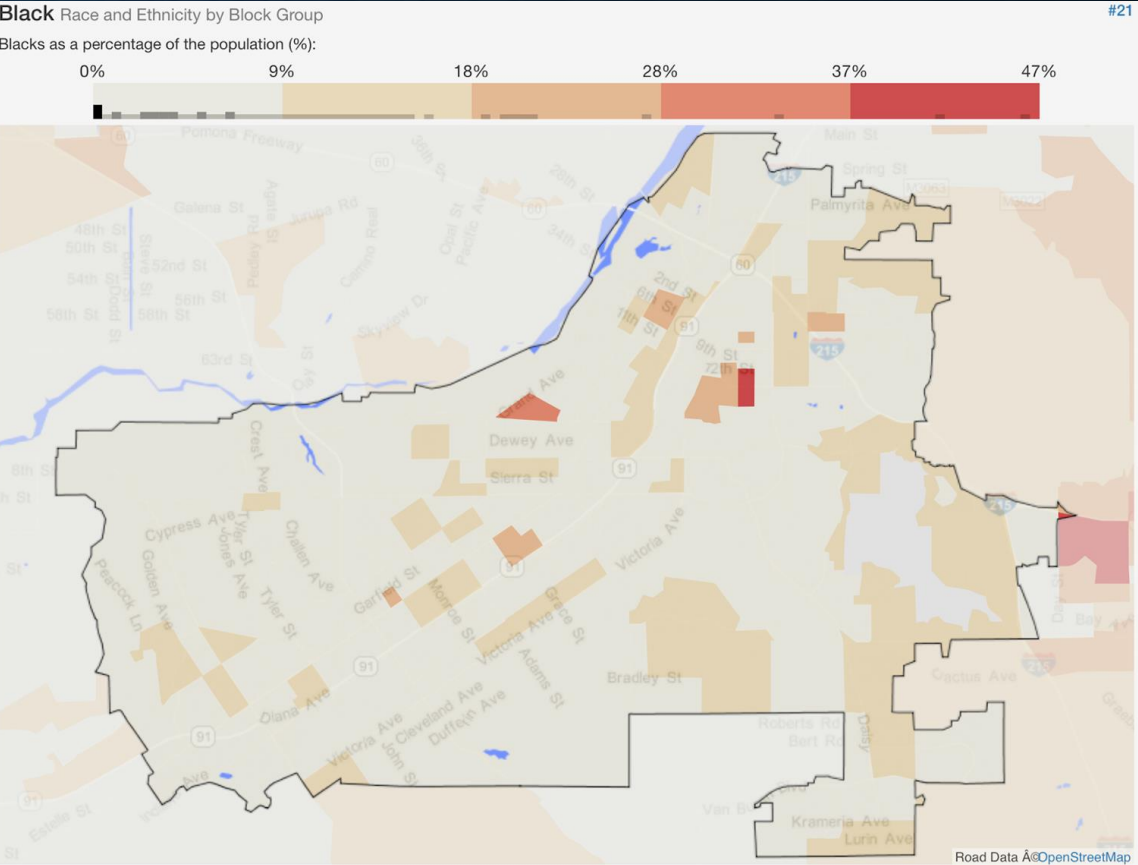


Count number of members in ethno-racial group  
<sup>1</sup> non-Hispanic    <sup>2</sup> excluding black and Asian Hispanics

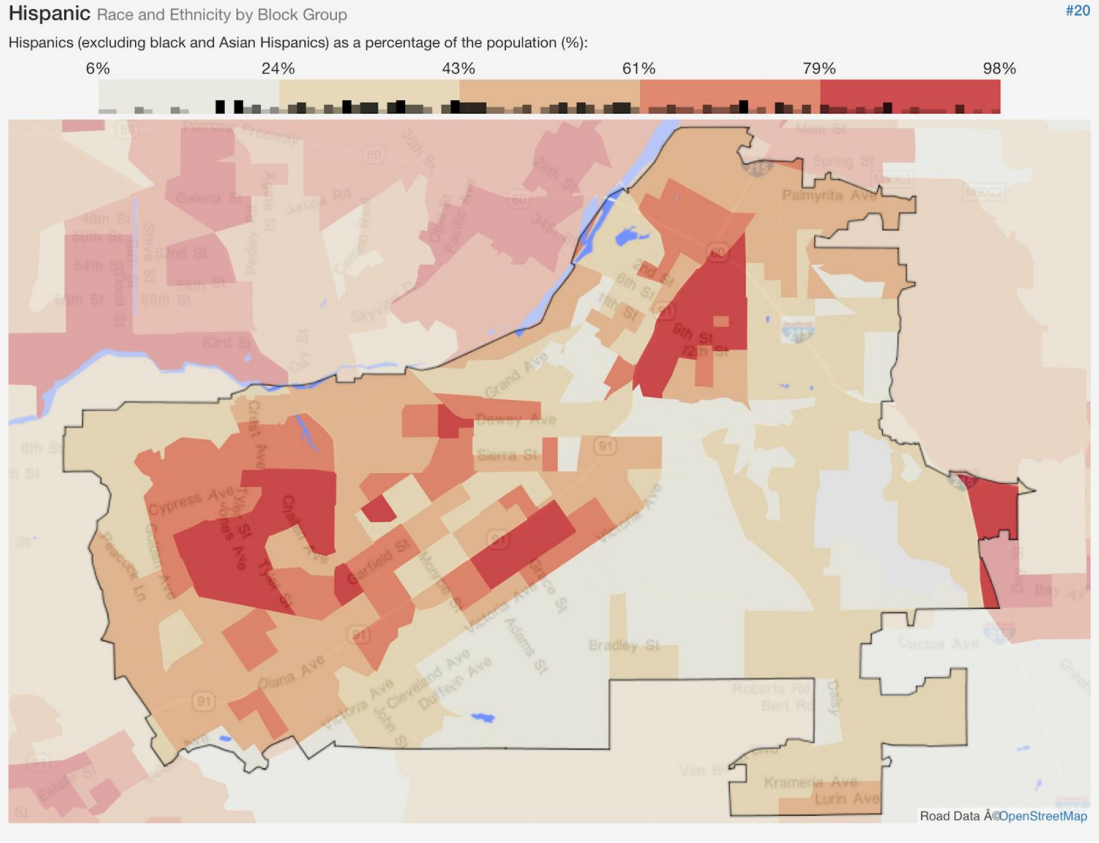
# White



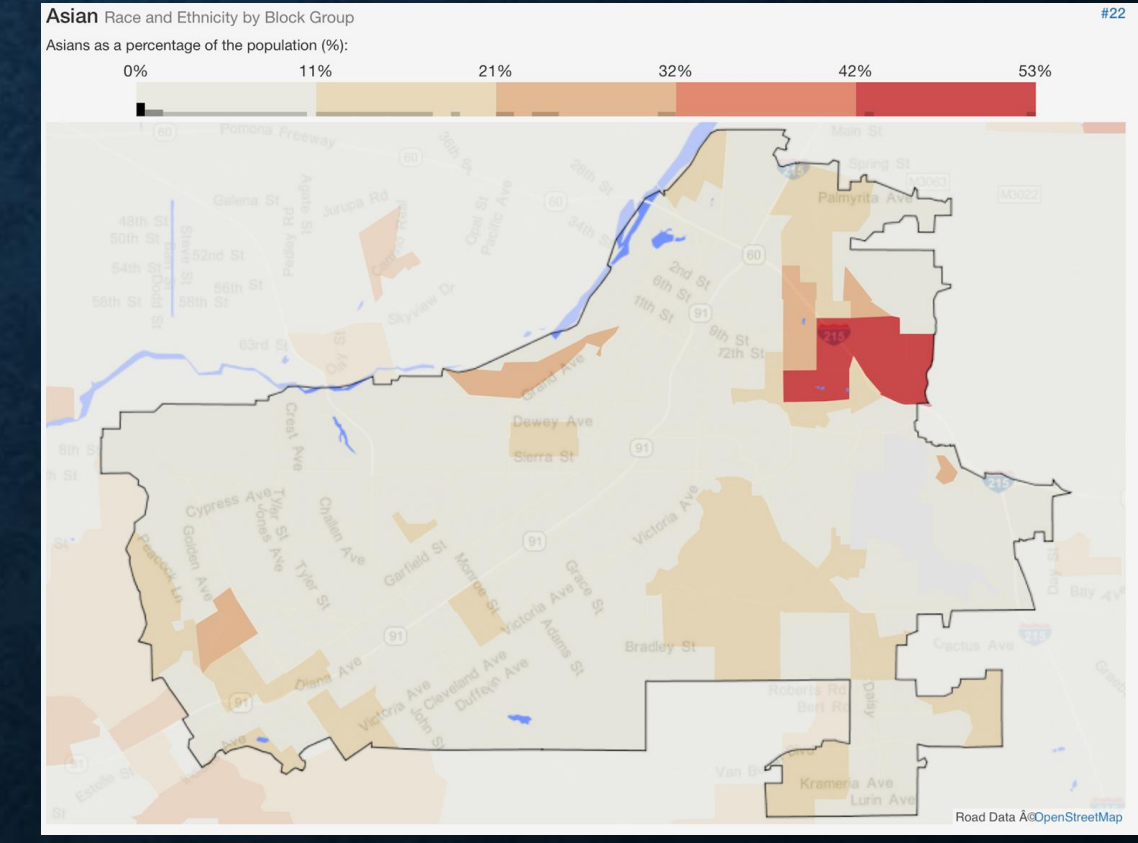
# Black



# Hispanic



# Asian



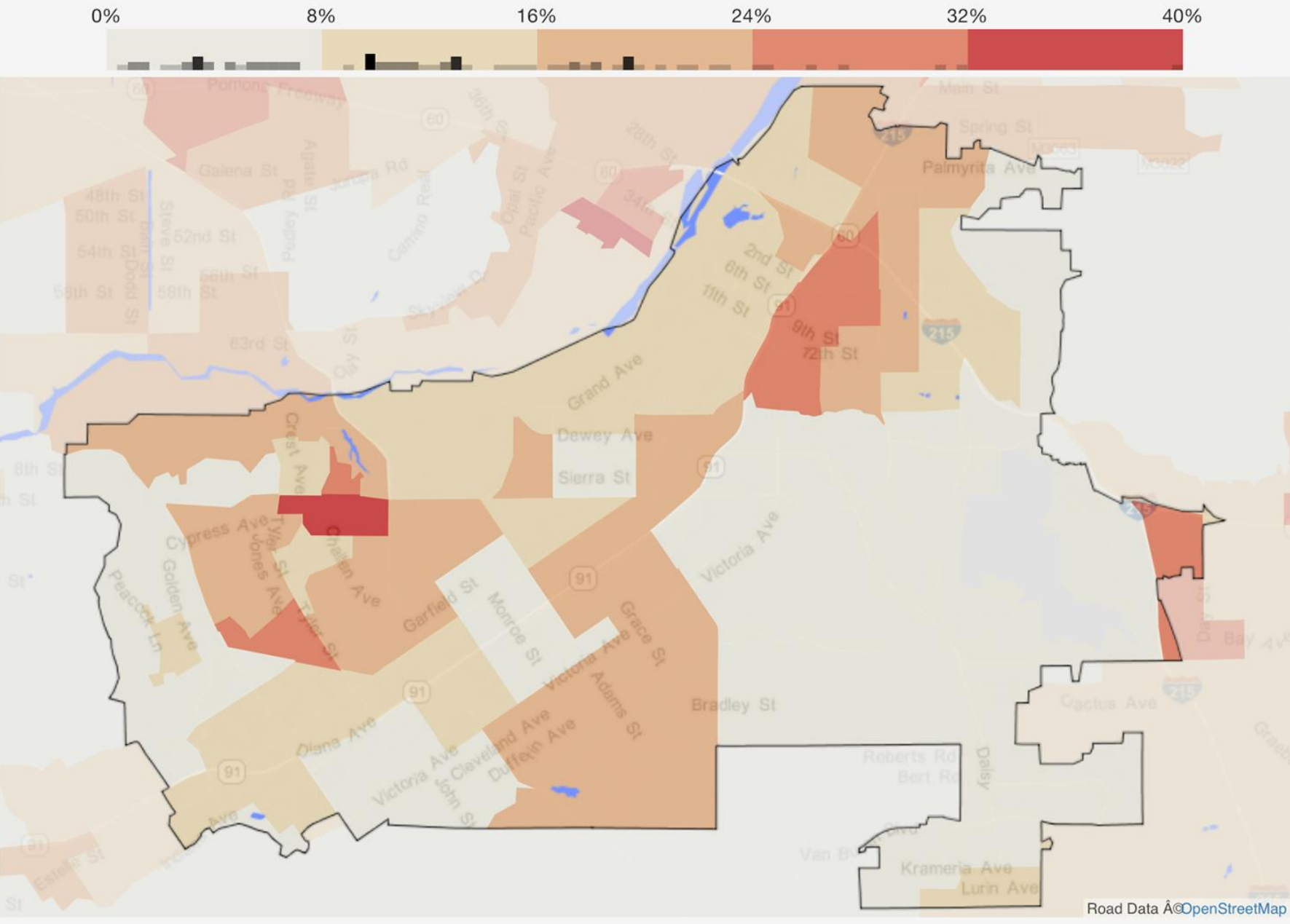


# Map of Food Stamps by Tract in Riverside

Food Stamps Food Stamps by Tract

#6

Percentage of households (%):



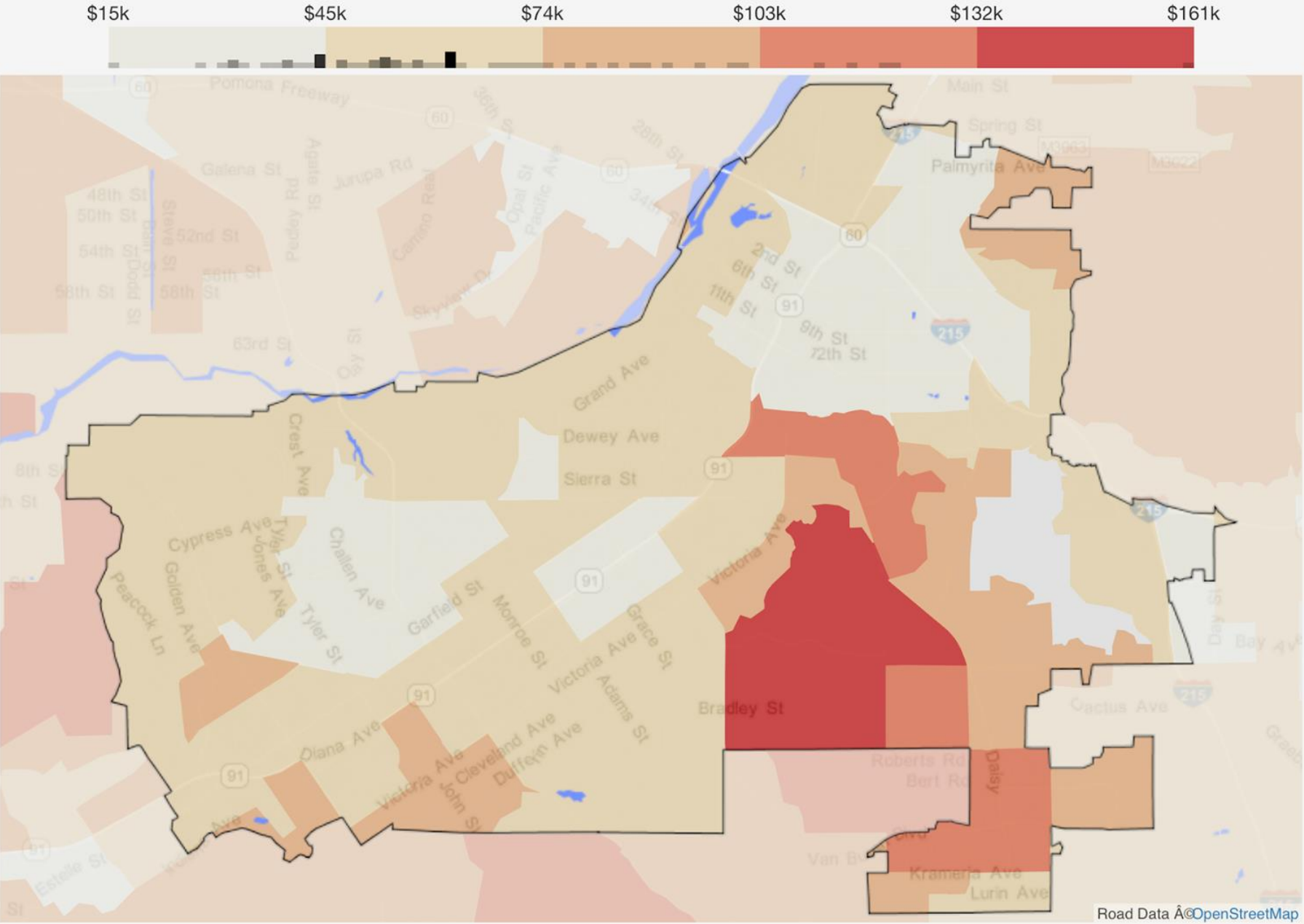
# Map of Household Income by Tract in Riverside

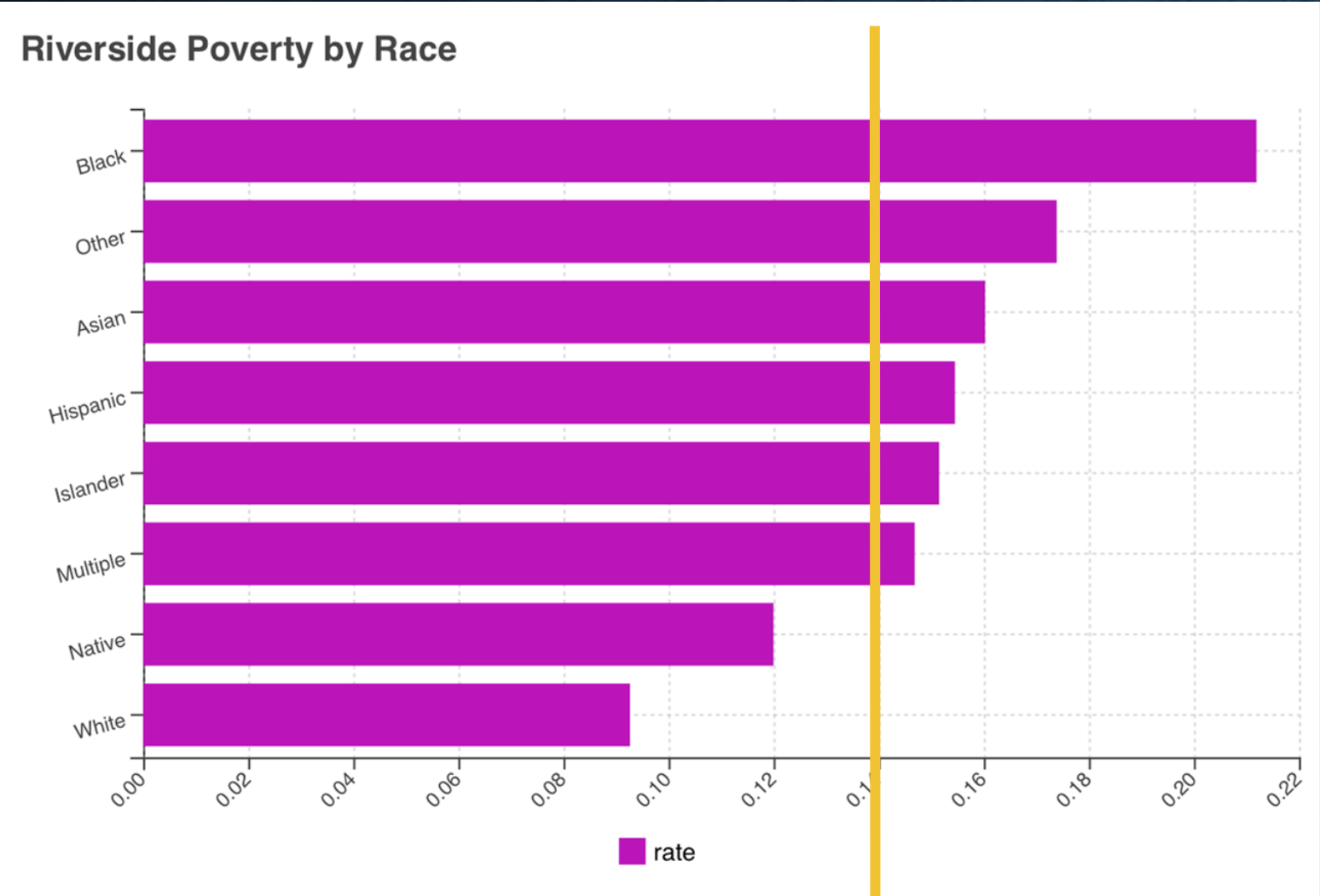
Median 20th Percentile Mean of the Top 5% Gini Index

Median Household Income by Tract

#16

Median household income (\$):





Average

Show Source	
13.93%	Overall Poverty Rate
12.94%	Male Poverty Rate
14.92%	Female Poverty Rate

Name	Total	In Poverty ▾	Poverty Rate
Hispanic	169,965	26,262	15.45%
Other	69,450	12,077	17.39%
White	93,493	8,663	9.27%
Black	19,088	4,045	21.19%
Asian	21,302	3,414	16.03%
Multiple	15,041	2,209	14.69%
Native	2,617	314	12.00%
Islander	825	125	15.15%



**From:** Jonny Miller <[jonnymillerjr@gmail.com](mailto:jonnymillerjr@gmail.com)>

**Sent:** Saturday, May 1, 2021 7:22:52 PM

**To:** Arseo, Eva <[EArsseo@riversideca.gov](mailto:EArsseo@riversideca.gov)>; Edwards, Erin <[EEwards@riversideca.gov](mailto:EEwards@riversideca.gov)>; Melendrez, Andy <[ASMelendrez@riversideca.gov](mailto:ASMelendrez@riversideca.gov)>; Plascencia, Gaby <[GPlascencia@riversideca.gov](mailto:GPlascencia@riversideca.gov)>

**Subject:** [External] Housing & Homelessness Committee Meeting, Mon., 5/1

City council members, I demand that you serve the interests of the people of Riverside, not the greedy developers. Along with the Riverside community and local activist groups, I propose the following:

- 
- Explore recent legislation that would provide zoning flexibility like SB 330
- “Housing Crisis Act” to address limitations in broad swaths of Ward 4
- 
- Need to move past density being equated to affordable housing. This is using
- the state's density descriptor of affordability. After the opportunity sites zoning, the city creates policies and selects priority projects that lead to permanent affordability housing like co ops,
- community land trust.
- 
- Look for funding (including from city budget) to go to RTA for as many lines
- as possible at 15 minute service or better. Additional stops would be the secondary ask. Create frequent service on more transportation corridors throughout the city that can open for more RHNA zoning
- throughout the city
- 
- Eliminate single family zoning, we are running out of space as our population grows!
- 
- Strengthen a rent control ordinance far beyond Costa-Hawkins:
- 
- We need the city to play an active role for its residents to build community
- wealth that translates to permanent affordability housing projects (co-ops, community land trust, condos and etc).
- 
- The city needs to incentivize and remove barriers for housing zoning and development.
- 
- 
- To make sure houses get built, incentivize developers by lowering fees for on
- site construction and increasing fees for off site construction.

- 
- Stop concentration of poverty—mixed-income housing/inclusionary zoning is the best approach, 75% market rate and 25% affordable requirement should be the standard.
- 
- Existing warehousing and logistics regulation to protect residential and public spaces from negative effects of industrial uses don't go far enough - the setback standards for warehouses and logistics abutting residential zones and public facilities aren't even 300 feet - a good standard would be 1,000 feet.
- 
- Use CalEnviroScreen to map Environmental Justice communities and consider zoning overlays to prevent future industrial uses in these communities and
- protect the residents from further degradation of air quality and built environment.

--

Thank you for your time.

-

**Jonny Miller**



“Rise free from care before the dawn and seek new adventures.

Let noon find you at other lakes,

And night find you everywhere at home...

Grow wild according to thy nature.”

— **Henry David Thoreau, *Walden***

cc Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
DCM  
C&ED Director

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**From:** Allen Partono <[apart003@ucr.edu](mailto:apart003@ucr.edu)>  
**Sent:** Monday, May 3, 2021 3:10 PM  
**To:** Arseo, Eva <[EArseo@riversideca.gov](mailto:EArseo@riversideca.gov)>  
**Subject:** [External] Housing and Homelessness committee meeting comments

To whom it may concern,

Hello, I hope you are doing well! My name is Allen, and I wanted to submit some recommendations for the committee meeting:

- First, the city needs to incentivize and remove barriers to housing zoning and development. Existing in-lieu and density bonus incentives are optional and ineffective. Affordable set-asides should be mandatory at least 25% and any fees collected should be directed to subsidizing affordable housing and neighborhood improvements in areas with existing affordable housing that is concentrated or segregated from higher-income neighborhoods.
- Second, to make sure houses get built, incentivize developers by lowering fees for on-site construction and increasing fees for off-site construction. Fees that come from off-site construction should be restricted funds to build affordable housing.
- Finally, stop concentration of poverty—mixed-income housing/inclusionary zoning is the best approach, 75% market rate, and 25% affordable requirement should be the standard.

Thank you so much for having these meetings to consider these points. I hope you all will take these recommendations so we can improve the quality of life here in the city of Riverside.

Best Regards,

**Allen Partono** (He, Him, His)  
MPH Candidate | UC Berkeley  
BS Bioengineering | Magna Cum Laude | UCR Class of 2019

cc Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
DCM  
C&ED Director



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**From:** Connie Decker <[conniedecker08@gmail.com](mailto:conniedecker08@gmail.com)>  
**Sent:** Thursday, May 6, 2021 11:48 AM  
**To:** Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)>  
**Subject:** Re: [External] HOUSING & HOMELESS Committee

Yes, please Matt!!

Connie

Sent from my iPhone

On May 6, 2021, at 11:09 AM, Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)> wrote:

Hi Connie,

Thank you for your comments – I noticed that I was the only recipient of this email. Would you like me to forward this to the City Clerk so that it can be distributed to the Council Housing & Homelessness Committee Members as well?

Thanks!

**Matthew Taylor | Senior Planner**  
951.826.5944 | [mtaylor@riversideca.gov](mailto:mtaylor@riversideca.gov)

**City of Riverside**  
Community & Economic Development Department  
*Planning Division*  
3900 Main Street | 3<sup>rd</sup> Floor | Riverside 92522

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**From:** Connie Decker <[conniedecker08@gmail.com](mailto:conniedecker08@gmail.com)>  
**Sent:** Wednesday, May 5, 2021 9:13 PM  
**To:** Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)>  
**Subject:** [External] HOUSING & HOMELESS COMMITTEEhich

May 5, 2021

**Matt Taylor**  
**City of Riverside**  
Community & Economic Development Department

*Planning Division*

As a community member of the Housing and Homeless Committee, I have been asked by Matt Taylor to submit my thoughts so far.

I have talked to City Council members for years about our homeless and the problems that come with them. Like so much of our community, I don't want drugs, danger, vagrants, crime, and all the rest in my community. I also don't want any project that will decrease the property values for which we have worked so hard. This doesn't make me a heartless individual; I am raising a family and protecting my investment.

I am opposed to changing the zoning regulations in residential communities. They were put there for a reason. In my Victoria Woods neighborhood, I am engaged in the opposition to the building of 44 condos on the corner of Fairview and Central. Now I am told that the developer was granted various concessions by making it a "senior affordable community". The developer, on a video discussion with neighbors, indicated that this **44 Condos** project is one of the identified parcels for the HOUSING & HOMELESS! We have been told by the Baptist Church across the street from this project that they have 8 acres on which a developer will build hundreds of apartment units. The traffic impact in and out of Victoria Woods will be considerable. We shouldn't have to fight for our community! I could spend several pages explaining the issues we have with these projects, but I'm going to try to not wander.

As I join these zoom meetings with the committee, I understand that I am supposed to supply concerns of residents. While I understand the transportation concerns, why can't we build transportation routes farther out of the city, where more residential communities could be built?

I am happy to discuss this with any of you.

Connie Decker

5323 Cornwall Ave.

Riverside, CA 92506 we have worked so hard for. This doesn't make me a heartless individual; I am raising a family and protecting my investment.

I am opposed to changing the zoning regulations in residential communities. They were put there for a reason. In my Victoria Woods neighborhood, I am engaged in the opposition to the building of 44 condos on the corner of Fairview and Central. Now I am told that the developer was granted various concession by making it a "senior affordable community. The developer, on a video discussion with neighbors, indicated that this **44 Condos** is one of the identified parcels for the HOUSING & HOMELESS! We have been told by the Baptist Church across the street from this project they have 8 acres on which a developer will build hundreds of apartment units. The traffic impact in and out of Victoria Woods will be considerable. We shouldn't have to fight for our community! I could spend several pages explaining the issues we have with this project, but I'm going to try to the topic.

As I join these zoom meetings with the committee, I understand that I am supposed to provide community input. I see that Matt is trying to meet the obligation that the state has given. I just don't accept that you can put the homeless problem on the backs of residents. While I

understand the transportation concerns, why can't we build transportation routes farther out of the city, where more residential communities could be built?

I am happy to discuss this with any of you.

Connie Decker  
5323 Cornwall Ave.  
Riverside, CA 92506  
[conniedecker08@gmail.com](mailto:conniedecker08@gmail.com)

cc Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
DCM  
C&ED Director

**From:** [Marven Norman](#)  
**To:** [Janice Rooths](#)  
**Cc:** [Edwards, Erin](#); [Melendrez, Andy](#); [Plascencia, Gaby](#); [Taylor, Matthew](#); [Zelinka, Al](#)  
**Subject:** [External] Re: Housing Element Change Requests for Consideration in Committee 5/3/21  
**Date:** Monday, May 3, 2021 11:52:27 AM

---

I think it might be worth drawing more attention to the fact that the only group that's below the average poverty rate is white (and native, but that's a much smaller portion of the Riverside population), adding another dimension and urgency to the fact that Ward 4 is whiter than the city overall while getting the smallest allotment for housing.

Cheers,

Marven E. Norman (he/him), Policy Specialist

Center for Community Action and Environmental Justice

| C: (951) 543-1743 | E: [marven.n@ccaej.org](mailto:marven.n@ccaej.org) | W: <https://www.ccaej.org>

On Mon, May 3, 2021 at 6:08 AM Janice Rooths <[antiracistriverside@gmail.com](mailto:antiracistriverside@gmail.com)> wrote:

From: Antiracist Riverside in solidarity with Inland Equity Partnership, Center for Community Action & Environmental Justice, and Other Community Members

To: Housing & Homelessness Committee Members:

We are concerned about racial and economic segregation in the City of Riverside particularly the concentration of whites and wealth in Ward 4, how current zoning, policies, & designated transportation corridors in the Housing Element perpetuate the racial and economic segregation while ensuring density does not increase in Ward 4, and how the focus of this housing element should be developing the types of housing options that build wealth for those who will live in the housing especially very low through middle income residents.

The following are requested changes that we believe should be included in the Housing Element plans as well as the Inclusionary Housing policy:

=Explore recent legislation that would provide zoning flexibility like SB 330 "Housing Crisis Act" to address limitations in broad swaths of Ward 4 - if so, consider reviewing Prop R and Measure C - are these truly being used agriculturally or protecting wealthy communities by protecting the practice of through exclusionary zoning.

=Need to move past density being equated to affordable housing. This is using the state's density descriptor of affordability. When projects are being considered, Density bonuses are used for incentives. In seeing higher density housing projects, will not always translate as a marker for affordability. After the opportunity sites zoning, the city creates policies and selects priority projects that lead to permanent affordability housing like co ops, community land trust.

=Look for funding (including from city budget) to go to RTA for as many lines as possible at 15 minute service or better. Additional stops would be the secondary ask.

=Goal is to create frequent service on more transportation corridors throughout the city that can open for more RHNA zoning throughout the city (including Ward 4)

=Eliminate single family zoning, we are running out of space as our population grows!

=Strengthen a rent control ordinance far beyond Costa-Hawkins.

=We need the city to play an active role for its residents to build community wealth that translates to permanent affordability housing projects (co-ops, community land trust, condos and etc).

=The city needs to incentivize and remove barriers for housing zoning and development. Existing in-leiu and density bonus incentives are optional and ineffective. Affordable set asides should be mandatory at least 25% and any fees collected should be directed to subsidizing affordable housing and neighborhood improvements in areas with existing affordable housing that is concentrated or segregated from higher income neighborhoods.

=To make sure houses get built, incentivize developers by lowering fees for on site construction and increasing fees for off site construction. Fees that come from off site construction should be restricted funds to build affordable housing.

=Stop concentration of poverty—mixed-income housing/inclusionary zoning is the best approach, 75% market rate and 25% affordable requirement should be the standard

=Existing warehousing and logistics regulation to protect residential and public spaces from negative effects of industrial uses don't go far enough - the setback standards for warehouses and logistics abutting residential zones and public facilities aren't even 300 feet - a good standard would be 1,000 feet

=Use CalEnviroScreen to map Environmental Justice communities and consider zoning overlays to prevent future industrial uses in these communities and protect the residents from further degradation of air quality and built environment.

Thank you for your attention to this matter.

In Solidarity for a Better Riverside!



***Our Mission is to Empower Individuals, Organizations, & Communities to Eliminate Racism***



LAW OFFICE OF  
**MICHAEL V. HESSE**  
A PROFESSIONAL CORPORATION

May 27, 2021

~E-Mail & U.S. Mail ~

Matthew Taylor  
Riverside City Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522

RECEIVED

JUN - 3 2021

**Re: Phase 1 General Plan Update: 6<sup>th</sup> Cycle Housing Element**

Community & Economic  
Development Department

Dear Mr. Taylor:

We own and occupy the office located at 4515 Tyler Street, Riverside, California. Our property includes .86 acre and a 70-year-old office building. We have owned and occupied the office since 1989.

We received your May 21, 2021, Notice of Proposed Rezoning—City of Riverside 6<sup>th</sup> Cycle Housing Element Update. The proposal includes a change of zone to Mixed Use-Village ("MU-V") for several parcels on Tyler Street, including ours. The proposed rezoning is outstanding—and long overdue. The properties along Tyler Street north of Hole Avenue have deteriorated in the last decade for a variety of reasons. The proposed rezoning will encourage and make it economically feasible to redevelop this area. This will result in more desirable residential units, upgraded commercial structures and an increased tax base for the city.

Thank you very much for your thoughtful and well-designed land use plan.

Please contact us if we can be of any assistance in moving your proposed rezoning forward.

MICHAEL V. HESSE,  
A PROFESSIONAL CORPORATION

By:   
Michael V. Hesse

MVH/mp

Date: 6-8-21

Item No. 1

---

**From:** Paul Mueller <pablopo@charter.net>  
**Sent:** Friday, June 4, 2021 5:06 PM  
**To:** Arseo, Eva <EArseo@riversideca.gov>  
**Subject:** [External] To All Council Members

My wife and I wish to express, in the strongest possible terms, our opposition to the creation of "Opportunity Sites" within our city. The resultant congestion, additional traffic and negative impact upon residential neighborhoods is not in the best interests of your constituents. While we are specifically opposed to the "44 Condos" project, we consider all new "high density" housing to be detrimental. Please act on behalf of those who have elected you and vote no on this terrible proposal.

Yours truly,

Paul and Christine Mueller

2337 Elsinore Rd.

Riverside

cc: Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
DCM  
CEDD Director

**From:** [Jonathan Shardlow](#)  
**To:** [Kopaskie-Brown, Mary](#); [Brenes, Patricia](#)  
**Cc:** [Taylor, Matthew](#)  
**Subject:** [External] 3315 Rezoning Proposal  
**Date:** Thursday, June 10, 2021 1:58:50 PM

---

Mary and Patricia,

Our office represents the owners of 3315 Van Buren. I understand the site is being considered for rezoning to MU-V – Mixed Use Village. The owners are fourth generation business owners who have operated since 1945 and they have been in recent discussions in connection with lessees who plan to operate the property with updated uses and uses the City may deem more favorable. Rezoning the property would have the opposite impact by requiring the property to continue the existing use to preserve their non-conforming status. (if the rezone occurs). The site is adjacent to a freeway and a railway, and in a location the environmental justice community has fought against commercial/residential uses. The site is also surrounded by existing industrial uses. As with the Northside, and those industrial property owners, I believe the City acknowledged a zoning designation, such as Mixed-Use Village would be a *slow* transition. Our office is currently processing high density residential mixed use with the downtown specific plan and believe there are better sites to designate for RHNA purposes.

The City has not also formally made a determination as to the current use being legally non-conforming which would be a good first step. It is also my understanding the City has taken a broad interpretation of a new use as potential lessees appear to be able to continue the new use without the need of a MCUP. (If the owner is required to file for a MCUP, time would be of the essence). For example, in my opinion, the current operation of a retail, sales, and manufacturing business is like for like with an equipment rental business. Nevertheless, there are several creative ways to obtain resolution, with our preferred resolution of keeping the current zoning. Are you available for a quick call/meeting to talk about resolutions?

Jon



---

Jonathan Shardlow  
Shareholder

Gresham Savage Nolan & Tilden, PC  
550 East Hospitality Lane, Suite 300  
San Bernardino, CA 92408  
Office: (909) 890-4499 Ext. 1770  
Fax: (909) 890-9877  
[www.GreshamSavage.com](http://www.GreshamSavage.com)  
[jonathan.shardlow@greshamsavage.com](mailto:jonathan.shardlow@greshamsavage.com)

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LEGAL SERVICES CORPORATION

June 17, 2021

Gianna Marasovich  
Housing Policy Analyst, Housing Policy Division  
2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833

RE: City of Riverside Draft Housing Element

Dear Ms. Marasovich,

This letter is to provide comments on the City of Riverside's draft General Plan Housing Element for the Fifth Cycle (2021-2029). Inland Counties Legal Services is the largest non-profit legal services provider in the Inland Empire Region. One of our areas of focus is to preserve affordable housing for low-income persons living in Riverside and San Bernardino Counties.

The Draft Housing Element ("Draft") contains numerous deficiencies and does not comply with Housing Element law as described below.

## **TECHNICAL BACKGROUND REPORT**

### **Special Housing Needs**

Gov. Code § 65583(a)(7) outlines an analysis of the housing needs of farmworkers, listed as "Agricultural Workers" on Page 19 of the Technical Background Report, but the analysis is not complete – it does not include any description of the City's role in working cooperatively with local growers or farmworker advocates to determine available resources and shortfalls, or with agricultural employers to identify sites and pursue funding from HCD or the US Department of Agriculture. Furthermore, the Draft's conclusion that "promoting affordable housing for extremely low and very low-income households would address the housing needs of agricultural workers in Riverside, if any" minimizes the unique and significant housing needs of farmworkers in that, even while acknowledging a limited need for agricultural worker housing, it presupposes that none such workers live in or near Riverside. Lastly, Program HE 5-4 ("Employee and Farmworker Housing") acknowledges that the Zoning Code does not address the requirements of the Employee Housing Act, specifically as it pertains to farmworker housing but does not provide a date as to when the Code will be amended to address those requirements.

The City's analysis of the housing needs of seniors, also prescribed under Gov. Code § 65583(a)(7), does not include any listings of available resources or services addressing senior housing needs in the City, such as existing senior housing complexes retirement communities' food banks and second-harvest programs, or volunteer operators of meals-on-wheels programs. It also does not directly identify any potential housing challenges faced by the elderly or any assessment of unmet needs other than tangentially in Program H-38, which refers to the Seniors Housing Task Force Report of October 26, 2004. Similarly, the City's analysis of the housing needs of persons with disabilities (as also prescribed under Gov. Code § 65583(a)(7)) does not discuss resources in the area for persons with disabilities.

### **Assessment of Fair Housing**

AB 686, passed in 2018 and applicable to all housing elements due for revision on or after January 1, 2021, requires all state and local public agencies to facilitate deliberate action to address and relieve disparities from past patterns of discrimination to further inclusiveness in their jurisdictions' communities. To ensure that jurisdictions properly adhered to AB 686, HCD released a memo providing "Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements" (April 2021), available at [https://www.hcd.ca.gov/community-development/affh/docs/affh\\_document\\_final\\_4-27-2021.pdf](https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf). This memo noted that housing elements must describe "meaningful, frequent and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element." Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements (AFFH Guidance), pg. 21, citing Gov. Code §§ 65583(c)(9). Key stakeholders must include public housing authorities, housing and community development providers, advocacy groups, lower-income community members, fair housing agencies, and homeless service agencies, among others. The element must also describe the jurisdiction's outreach activities intended to reach a broad audience, a list of organizations contacted and consulted in the process and for what purpose, a summary of comments and how the comments are considered and incorporated, and a summary of issues that contributed to a lack of participation in the housing element process, if that proves to be the case. AFFH Guidance, pg. 21-22.

When the City originally submitted their draft Sixth Cycle Housing Element to HCD on May 10, 2021, it did not include an Assessment of Fair Housing. See Draft, 3, 10. The City submitted an AFFH Analysis on or around June 10, but the AFFH Analysis does not describe any community participation efforts as noted above. The Technical Background Report describes community participation, including engaging with stakeholders and a schedule of public meetings, workshops, and hearings on Pages 148-150. However, it does not include a full list of stakeholders engaged outside of organizations that conducted one-on-one meetings, nor does it include a summary of comments and how they are considered and incorporated, nor any analysis

on what contributed to a lack of participation in the housing element process beyond the COVID-19 pandemic.

## **ACTION PLAN**

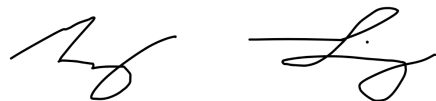
The City's Action Plan does not provide any definite time frames for implementation of any of the actions listed therein. Instead, the City provides timeframes of "ongoing", "short term", "mid-term", without any dates or meaningful benchmarks as to when they might be completed. Furthermore, there are no descriptions of the local government's specific role in program implementation, any specific steps to implement the program, proposed measurable outcomes, or demonstration of firm commitments to implement these programs. This runs counter to Gov. Code § 65583(c)'s guidelines for outlining the City's program for setting for a schedule of actions during the planning period.

Some programs that the City has included that need more detail and concrete deadlines include: preparing an Inclusionary Housing Program (Action Number HE-1.1), preparing a Zoning Code update to further facilitate development of emergency shelters, low-barrier navigation centers, transitional housing, permanent supportive housing, residential care facilities, and community care facilities (Action Program HE-2.3), and adopting a policy that encourages the development or adaptation of residential units accessible to people with physical disabilities (Action Program HE-3.3).

## **CONCLUSION**

Riverside's Draft Housing Element does not substantially comply with the requirements of Housing Element Law, and we urge HCD not to approve it. If you have any questions or would like to discuss our comments, please contact Anthony Kim at 951-248-4725 or [akim@icls.org](mailto:akim@icls.org).

Sincerely,



Anthony Kim, Staff Attorney  
INLAND COUNTIES LEGAL SERVICES

CC: Matthew Taylor, City Planner; Robin Huntley, HCD



June 17, 2021

Gianna Marasovich  
Housing Policy Analyst, Housing Policy Division  
2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833

RE: City of Riverside Draft Housing Element

Dear Ms. Marasovich,

This letter is to provide comments on the City of Riverside's draft General Plan Housing Element for the Sixth Cycle (2021-2029). Inland Equity Partnership is an anti-poverty advocacy coalition who has identified health care and housing as the two primary drivers of poverty. One of our areas of focus is to preserve affordable housing for low income persons living in Riverside and San Bernardino Counties. The Draft Housing Element ("Draft") contains numerous deficiencies and does not comply with Housing Element law as described below

**We have some further questions and considerations we wish the city of Riverside would address.**

The goals and outcomes are but they are very short general statements. The draft language for the policy recommendations do not include needed changes to city ordinances for the adoption of mentioned policy changes for HE-1 AFFORDABLE HOUSING, Policy HE-2 HOMELESSNESS and Policy HE-3 FAIR HOUSING and Policy HE-4 THRIVING NEIGHBORHOODS.

When will there be specific "updates to the Zoning Code that "could include urban design regulations, incentives for building the maximum number of homes allowed, allowance for the use of pre-approved construction plans and streamlined review and approval processes" mentioned that will bring the city into compliance with SB 330 and

## Streamlined Approval of Qualifying Affordable Housing Projects per SB 35?

### **HCD draft Riverside Housing Element Feedback survey tool:**

<https://www.surveymonkey.com/r/GLY6JTH>

After reviewing the tool, it is just listing the general policy recommendations and lacks specific ordinances that need changing to accommodate the new policies. There is also no real way to comment other than a 1 - 5 star rating tool.

### **Additional Questions by our Partner Organizations**

- Since Ward 4 had the lowest RHNA allocation in the city, we would appreciate the exclusion of ADU units as RHNA count for Ward 4 and include more affordable housing zoning is needed in Ward 4 in areas such as: 1) Around Martin Luther King high school 2) Washington/Alessandro
- Consider reviewing Prop R and Measure C - are these truly being used agriculturally or protecting wealthy communities by protecting the practice of through exclusionary zoning.
- Look for funding (including from the city budget) to support RTA for as many lines as possible at 15 minute service or better to increase the number of 'transit corridors throughout the city to create more affordable housing opportunities.
- Eliminate R1 single family zoning.
- Work with Fair Housing Council of Riverside County, Inc. in getting data related to fair housing needs"
- Strengthen rent control ordinances far beyond Costa-Hawkins:  
[https://docs.google.com/document/d/1-t-hw7ZbSq7zet2QVpPQUhAbwxX-Bwm-sq34K0MX\\_6U/edit?usp=sharing](https://docs.google.com/document/d/1-t-hw7ZbSq7zet2QVpPQUhAbwxX-Bwm-sq34K0MX_6U/edit?usp=sharing)
- Play an active role to create opportunities in the City of Riverside residents to build community wealth with permanently affordable homes projects (co-ops, community land trust, condos etc.)
- Create inclusionary zoning ordinances to incentivise the construction of affordable homes or subsidizing affordable homes with increasing fees for developments that do not include affordable housing.

- Existing warehousing and logistics regulation to protect residential and public spaces from negative effects of industrial uses don't go far enough - the setback standards for warehouses and logistics abutting residential zones and public facilities aren't even 300 feet - a good standard would be 1,000 feet
- Use CalEnviroScreen to map Environmental Justice communities and consider zoning overlays to prevent future industrial uses in these communities and protect the residents from further degradation of air quality and built environment

## CONCLUSION

Without the specific ordinance language, we are not comfortable supporting the adoption of Riverside's Draft Housing Element. If you have any questions or would like to discuss our comments, please contact Maribel Nunez at (562) 569-4051 or [maribel@inlandequitypartnership.org](mailto:maribel@inlandequitypartnership.org)

Sincerely,  
Maribel Nunez, Inland Equity Partnership, Executive Director

Hilda Cruz, Interfaith Movement for Human Integrity, Faith Organizer

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Norma Barles, President  
LULAC of Riverside, Council 3190  
[barlesnorma@gmail.com](mailto:barlesnorma@gmail.com)



**From:** [Watts, Michael](#)  
**To:** [Andrade, Frances](#); [Fierro, Ronaldo](#); [Taylor, Matthew](#)  
**Cc:** [troutquilt@sbcglobal.net](mailto:troutquilt@sbcglobal.net); [triciahord@yahoo.com](mailto:triciahord@yahoo.com); [datkinson1@att.net](mailto:datkinson1@att.net); [frankbyrne1963@gmail.com](mailto:frankbyrne1963@gmail.com)  
**Subject:** [External] Proposed Fairview Avenue Senior Condo Proposal and the High Density Designation for 5500 Alessandro Blvd  
**Date:** Thursday, July 1, 2021 10:13:35 AM

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My wife and I are lifetime Riverside residents near the proposed 44 unit Condo project proposed on the 2 ½ acre site located at Fairview and Central Ave apparently referred to as the Fairview Avenue Senior Condominium Proposal. To better understand the issues surrounding this project, last evening, I attended a neighborhood meeting consisting of local residents and Todd Ridgeway, a newly appointed Planning Commissioner.

This proposed development is situated on a 2 ½ acre parcel, previously owned by the City of Riverside which under the former Master Plan was to become part of the Central Ave extension connecting to the existing Canyon Crest portion of Central Ave at Chicago Ave. This plan was abandoned after much debate with the residents in the area opposing the project as unsafe as well as the evidence that both Alessandro Blvd and Central Avenue could not safely handle any additional vehicular traffic.

I also learned that under ongoing mandates from the Regional Housing Needs Assessment guidelines our city was arbitrarily changing the zoning of faith-based organizations to build affordable housing on their parking lots thus eliminating current zoning regulations as well as eliminating any local parking restrictions or requirements. In reviewing the map of properties now designated as high-density, affordable housing sites under the Regional Housing Needs Assessment guidelines I noted that the Church property, located at 5500 Alessandro Ave had been re-designated as a high-density housing property.

I have recently began wondering why so many church properties had been sold or purchased by other tax exempt faith-based entities, but after reading more about AB1851 I believe I might have a better understanding of the economics behind these purchases. However, that is another issue and concern for a later time.

I also noticed that the proposed properties identified for compliance with the Regional Housing Needs Assessment guidelines in the City of Riverside apparently did not identify large, open, vacant, flat land in the areas south of Victoria Avenue in the Hawarden Hills and Green Belt areas. There must certainly be hundreds of acres in this area that would help the City of Riverside comply with the Regional Housing Needs Assessment guidelines. Again, another issue and concern for another time.

Now to the Fairview Avenue Senior Condominium Proposal. When the City of Riverside originally sold this property to an investor it was the understanding of the neighborhood it was to build 4-6 single family homes on the property. We had no problem with that proposal and felt that it would fit into the historical makeup of the neighborhood along with not adversely or significantly impacting the already excessive, unsafe traffic on Alessandro Blvd and Central Avenue.

My concern is with the current proposal of a 44 unit condo project with the significant number of new housing units, the limited parking and limited access. Without a doubt the amount of new cars being added to a poorly developed and designed roadway like Fairview will adversely and significantly impact the a traffic safety issues in this neighborhood.

I'm a retired Patrol/Traffic Sergeant with Riverside Police Department. I know too well the history and ongoing daily challenges of traffic safety in and around the area of Fairview/Alessandro/Central. Due to the State of California's ongoing refusal to build more connecting freeways across the southside of the City of Riverside, our city is forced to live with ever-increasing traffic issues at the 60/91/215 interchange. For motorists who commute from Moreno Valley/Perris/Menifee every day they know that driving through the City of Riverside on Alessandro to the 91 freeway eliminates having to deal with the chokepoint at the 60/91/215 interchange. Because Alessandro Blvd is "downhill" into our city, excessive/unsafe speeds are always a major issue. Unsafe speed and inattention lead to regular injury accidents on all of Alessandro Blvd but even more so in the "S" curves at Glenhaven/Royal

Hill/Gloucester/Royal Ridge/Fairview cross streets. Alessandro Blvd in this specific area is probably the most dangerous and unsafe street in the City of Riverside.

In addition to the unsafe traffic conditions on Alessandro at Glenhaven/Royal Hill/Gloucester/Royal Ridge cross streets, the city also has an unsafe issue with Fairview Ave particularly between Central Avenue and Glenhaven (where this project is proposed). On a daily basis, vehicles not familiar with this one-way road inadvertently drive the wrong way on Fairview. This has been regularly documented by residents living there with their security cameras.

There is no way that the City of Riverside can safely add an additional 50-70 cars to the daily driving needs on Fairview at Central Avenue where this project has been proposed. What could possibly be safer and acceptable is the original proposal of 4-6 single family homes that the neighborhood was told would be built there.

Finally, let's address the church property located at 5500 Alessandro Blvd. The same issue applies to this property. To designate this property as a high-density site to build 100's of housing units would also greatly add to the current existing unsafe traffic conditions on Alessandro Blvd and Central Avenue. The hundreds of new residents will also add hundreds of vehicles to this small location and these new residents would be forced to use Alessandro Blvd an already overused and unsafe roadway. It should also be noted that there are two "private" schools at the intersection of Gloucester/Royal Ridge and Alessandro (Church on the Hill and Emmanuel Lutheran) . There is a third private school at Central & Victoria (Temple Bethel). There is Alcott elementary school at Central and Falkirk and there is Poly High School at Central and Victoria. All of these schools add to the existing high traffic activity in the area along with the presence of children of all ages constantly walking to and from their schools. There is also a preponderance of youthful, inexperienced high school aged new drivers to also add to the mix in an already very busy and unsafe network of public streets.

In conclusion, the immediate area in and around the area bordered by

Alessandro/Glenhaven/Gloucester/Royal Ridge/Fairview/Central/Falkirk is already an unsafe, overused network of roadways. Adding potentially hundreds of additional vehicles to this already oversaturated and unsafe traffic network is irresponsible. A decision to allow these two actions will expose the current families living in this neighborhood to unnecessary and preventable risks. Restrict the development on the 2 ½ acre parcel to 4-6 single family homes as originally proposed and REMOVE the high-density housing designation from the church property located at 5500 Alessandro Blvd.

Your actions regarding both of these matters will either save lives or cost lives.

Please forward a copy of our concerns to all members of the Planning Commission, Planning Department and the City Council.

Thank you,

Michael & Madeline Watts  
5636 Royal Ridge Drive  
Riverside, CA 92506  
951-347-2490  
mike@sheepdogenterprises.org

-----Original Message-----

From: MELANIE MILLER <flygirlmel1@sbcglobal.net>

Sent: Wednesday, August 4, 2021 6:05 PM

To: Andrade, Frances <FANDRADE@riversideca.gov>

Subject: [External] Multi Unit Housing CEDD

I DO NOT want Multi Unit Housing to infiltrate the Riverside County or City area...it will increase traffic, lower the value of existing houses, over crowd neighborhoods and schools...this is a mandate by Sacramento that must be stopped...they don't live in or near any of the affected areas they are trying to re-zone...THIS MUST BE STOPPED NOW ususus

Sent from my iPhone

I also DO NOT want Municipal Code 5.38 to be amended...thank you for forwarding.

Sent from my iPhone



August 6, 2021

Mayor Patricia Lock Dawson  
The City of Riverside  
Delivered via email to 2mayor@riversideca.gov

Ms. Mary Kopaskie-Brown  
Planning Manager  
The City of Riverside  
Delivered via email to MKopaskie-Brown@riversideca.gov

Re: Updated Housing Elements and Zoning Codes Must Meet Regional Housing Needs Allocation (RHNA) Targets **and Comply with Federal and State Housing Laws Including** Attainable Homeownership, Authorizing Housing That is Affordable by Design Without Reliance on Lottery Outcomes and Taxpayer Subsidies, Affirmatively Further Fair Housing, and Ending Residential Racial Segregation

Dear Mayor Dawson and Ms. Kopaskie-Brown,

The Two Hundred is a civil rights homeownership advocacy group that was founded and remains comprised of veteran civil rights leaders, former legislators and cabinet secretaries, retired judges, and other diverse housing advocacy leaders. Many of us worked for our entire careers to enact federal and state fair housing laws to end agency “redlining” practices such as denying communities of color access to insured home mortgages and veterans’ loans, and promoting residential racial segregation through razing historic minority neighborhoods through “redevelopment” and siting freeways to protect “public harmony” by dividing our communities.

California’s severe housing shortage, and astronomical (and still-rising) housing prices, have undone decades of civil rights progress. As confirmed by scholars at UC Berkeley, residential racial segregation is worse in the Bay Area than it was before the enactment of civil rights reforms in the 1960s – a pattern repeated in wealthier counties statewide. <https://belonging.berkeley.edu/segregationinthebay> As we explain in our *Redlining* video, minority homeownership rates, which in the early part of this century had finally started to attain parity with white families who had access to government programs like federally-insured low cost mortgages, plummeted during the Great Recession of 2009. With the full support of regulatory agencies, as of 2010 lenders engaged in more than a decade of predatory loans and foreclosures that wiped out trillions of dollars of the multi-generational wealth that our communities had finally accumulated through homeownership. Our communities now stagger from housing costs that are so high the US Census Bureau has confirmed that our state has the highest poverty rate in the country! When added to the other high costs of living in California, including the highest electricity and gasoline prices of any state other than California, almost

40% of our residents cannot reliably pay routine monthly expenses even after receiving public assistance to help buy food and medical care. [United Ways of California - The Real Cost Measure in California 2019 \(unitedwaysca.org\)](https://www.unitedwaysca.org/) California leaders should not brag about creating Silicon Valley billionaires without also recognizing the crushing burdens of decades of hostility to starter homes and other housing needed by our communities, nor can California's leaders lawfully hide behind unfunded rhetorical commitments to fund 100% "affordable" rental housing and again force our communities into segregated rental housing "projects."

We write because you have been entrusted with the decade's most important housing task, which is assuring that your agency complies with civil rights housing laws and updates your General Plan and Zoning Code to accommodate your community's share of new homes in compliance with your Regional Housing Needs Assessment (RHNA).

Both federal and state civil rights laws, as well as United States Supreme Court decisions, have long prohibited agencies from directing new "affordable" housing for lower income residents to a limited geographic subarea, and instead require the dispersal of new housing at all affordability levels throughout the community. In 2018, the California Legislature strengthened this longstanding civil rights requirement in AB 686 (effective January 1, 2019) which requires all public agencies to "affirmatively further fair housing" (AFFH) in California. As explained by the Housing and Community Development (HCD) agency, quoting from the new law, **"[p]ublic agencies must now examine existing and future policies, plans, programs, rules, practices, and related activities and make proactive changes to promote more inclusive communities."** [AFFH / Fair Housing \(ca.gov\)](https://www.hcd.ca.gov/fair-housing/)

Before the AFFH was enacted in 2018, and based on a complex set of planning, zoning, and environmental laws, policies and principles, most California cities and counties did in fact adopt "policies, plans, programs, rules, practices and related activities" that constrain housing supplies, and raise housing prices so high that our hard working families – the majority of which now include members in our communities of color – can no longer afford to buy, and in many neighborhoods cannot even afford to rent, a home. These status quo housing policies result in unlawful racial segregation, and violate the affirmatively furthering fair housing laws. Our families, many of which are led by the essential workers each community relies on such as teachers, first responders, workers in construction, health care, hospitality, small business employees, and laborers – cannot and should not be asked to wait to have their name drawn in an "affordable" housing lottery, or wait for "magic money" to appear from the repeal of Proposition 13 (or capitalism). State and local agency actions violate civil rights laws, including California's new AFFH, must stop – and housing production, of market-rate housing that can be purchased by median income families, must increase more than tenfold under the current RHNA cycle.

We hereby formally and respectfully request that these civil rights housing legal violations be corrected in your General Plan Housing Element and Zoning Code updates which feasibly, based on your median income families and your available funding resources today, plan for housing typologies and locations that meet your assigned RHNA targets. We identify below the worst offenders, and practical solutions, to assure that you do not adopt General Plan and Zoning Code updates that violate civil rights housing laws.

1. **Charging Country Club Initiation Fees for New Housing is Racist and Exclusionary.**

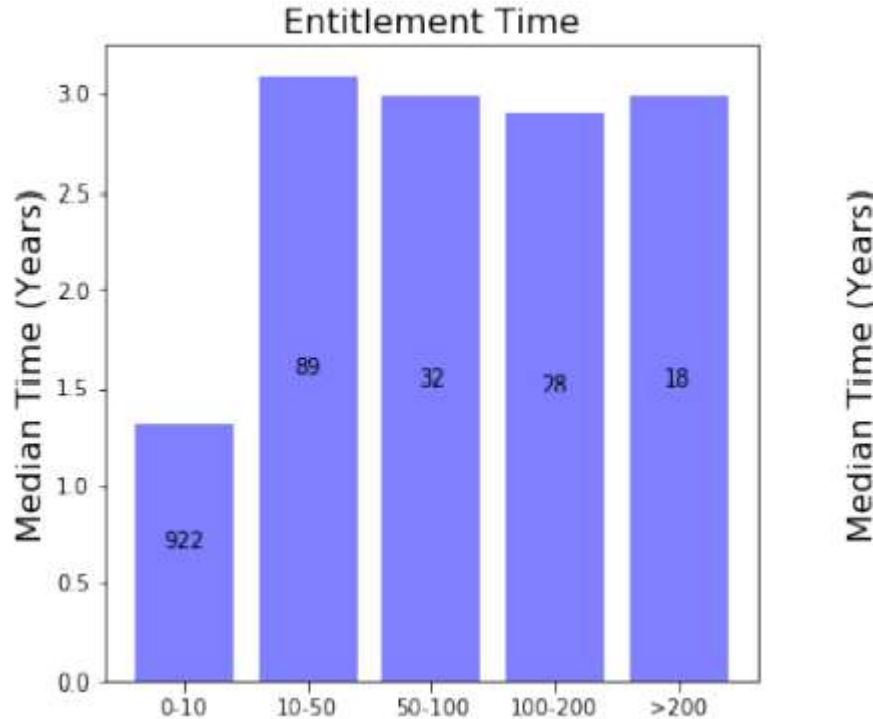
Country clubs often charge initiation fees of \$50,000 or more, with the express intent to select wealthier members and exclude “those people” who cannot afford steep fees. Many local agencies have imposed fees on new housing that wildly exceed even \$50,000, such as San Francisco which has charged fees of \$165,000 per apartment! While we appreciate that new homes need to pay for their “hard” infrastructure needs like water and sewage services, too many jurisdictions have allowed well-meaning special interests seeking additional funds for important local priorities like art, affordable housing, and recreational programs to pile these fees onto new housing rather than obtain funding (as or if needed by special assessments or taxes approved by existing residents) equitably, which means paid for equitably by the city’s existing (not just future) residents. As documented by UCB, excessive and wildly different housing development fees increase housing costs and decrease housing production and affordability – and these fees are passed along to new residents. [Development Fees Report Final 2.pdf \(berkeley.edu\)](#) Most cities and counties defend high fees on new housing with “nexus” studies, based on made-as-instructed reports prepared by consultants paid by cities. “Nexus” may pass constitutional muster, but violates civil rights housing laws by excluding housing – and “those people” (us) from your community.

**Civil Rights Compliant Solution to Exclusionary Fees:** *Residents of new housing should pay no more in fees than existing taxpayers. For example, if a city has 50,000 existing homes and a RHNA obligation to produce 5,000 more homes, housing fees should be capped at the levels paid by taxpayers. If existing city residential households subsidize arts program with \$500,000, residents of new housing should pay no more than the same share (\$100 per new home). If existing city residents contribute nothing to build affordable housing, then neither should residents of new housing: existing policies created the affordable housing shortage and crisis, and solving this problem on the backs of those shut out of the housing market creates an unfair, unlawful and racially discriminatory burden on new residents. Stop imposing discriminatory fees on new residents.*

2. **Housing Delayed is Housing Denied.** While some jurisdictions have streamlined the housing project review and approval process, most have not. The two most commonly-identified delay factors in the housing project approval process are multi-step, multi-department review processes with no intra-agency deadlines or housing accountability production metrics, and the California Environmental Quality Act (CEQA) review process. As shown in Figure 1, in one recent study of the San Francisco entitlement process, all but the smallest (less than 10 units) took about three years to complete this combined bureaucratic and CEQA process.



**Figure 1: Housing Project Entitlement/CEQA Process Time in San Francisco  
(by Project Size/Unit Count)**  
[Measuring the Housing Permitting Process in San Francisco - Turner Center  
\(berkeley.edu\)](#)



A. **End Bureaucratic Delays to Housing Approvals.** Also as explained by UCB, “[t]he most significant and pointless factor driving up production costs was the length of time it takes to for a project to get through the city permitting and development process” which in turn caused even higher costs as projects stuck in bureaucratic review proceedings were required to repeatedly modify their projects to deal with the “additional hoops and requirements” that “pop up” at various stages of the permitting and development process.  
[San Francisco Construction Cost Brief - Turner Center January 2018.pdf \(berkeley.edu\)](#), p. 2.

**Civil Rights Compliant Solution to Housing Delays Caused by Bureaucrats.** *This too has a simple solution: prescribe, disclose, enforce, and publish outcomes of housing review and approval deadlines on every city department (and responsible unit within each department), and hold responsible managers in each department accountable in performance evaluations and promotion decisions to meeting (or beating) deadlines. This is a housing production accountability metric that should be expressly added to General Plan Housing Element implementation mandates.*

B. **End Anti-Housing CEQA Abuse.** Before a misguided appellate court decision, issued without Legislative direction in 1984, CEQA did not apply to city and county approvals of housing that complied with General Plan and zoning ordinances. For several decades, however, increasingly fussy academics and planners insisted that zoning codes require a “conditional use

permit” (CUPs) even for code-compliant housing, to allow local agencies to apply a “we know it when we see it” open-ended level of discretion to allow, deny, or condition housing approvals – the same standard the Supreme Court applies to obscenity. In 1984, this CUP process – brought to us all by the same generation of planners that (obscenely) insisted on single-family only residential zoning and outlawed even duplexes that had previously been allowed and common throughout California – unleashed the full force of CEQA delays and lawsuits even on fully compliant housing in “infill” neighborhoods. [Friends of Westwood, Inc. v. City of Los Angeles \(1987\) :: California Court of Appeal Decisions :: California Case Law :: California Law :: US Law :: Justia](#) By 2008, housing had become the most frequent target of CEQA lawsuits – and the tool of choice for both those seeking to block housing and those seeking financial and other payoffs for threatening CEQA lawsuits. In one study of all anti-housing CEQA lawsuits in the Los Angeles region, for example, 14,000 housing units were targeted in CEQA lawsuits – 99% of which were located in existing urbanized areas (not “greenfields”), 70% of which were located within ½ mile of transit, and 78% of which were located in the region’s whiter, wealthier, and environmentally healthier communities. [In the Name of the Environment Update: CEQA Litigation Update for SCAG Region \(2013-2015\) | Insights | Holland & Knight \(hklaw.com\)](#) Instead of facilitating housing near jobs and transit, CEQA had been distorted into this generation’s anti-housing, anti-“those people” (us) redlining tool of choice.

***Civil Rights Compliant Solution to Anti-Housing CEQA Abuse.*** *Under the Housing Accountability Act, cities and counties no longer have the discretion to disallow housing, require fewer units, or impose fees and exactions that make housing projects infeasible. Local control determines the allowable location and density of housing, but these cannot be “paper housing” that is never actually approved (or approved with feasible conditions). Only housing that causes a demonstrable and specific significant adverse consequence to human health or safety can be downsized, delayed, or conditioned with costly obligations.* [Housing Accountability Act Technical Assistance Advisory](#) Housing Element implementation procedures should expressly acknowledge this state law as a prohibition on the local agency’s exercise of its discretion on any issue other than a demonstrable and specific adverse health or safety risk caused by the proposed housing project, and eliminate or limit subsequent CEQA review under conforming zoning requirements to prescribed objective health and safety standards specifically caused by the proposed housing project. As determined recently by the California Supreme Court, local government may still preserve exterior architecture and design review processes that do not create discretionary authority to add new conditions addressing CEQA topics. [McCorkle Eastside Neighborhood Group v. City of St. Helena :: 2019 :: California Courts of Appeal Decisions :: California Case Law :: California Law :: US Law :: Justia](#). Local General Plan and zoning codes following this recommendation avoid mandatory CEQA processing and litigation risks, and are a mandate – especially in the whiter, wealthier and healthier communities such as most of Marin County that have elevated their “no growth” environmentalism into open and flagrant racist conduct such as intentionally segregating its public schools by race. [First desegregation order in 50 years hits Marin schools - Los Angeles Times \(latimes.com\)](#)

3. **Avoid Exacerbating Racial Segregation with Special Interest Demands that Retard Housing Production and Increase Housing Costs.** Increased production of housing that is affordable that working families can purchase has been repeatedly blocked by many California's environmental organizations and their state agency allies. We and our families experience, and agree we should reduce, pollution – and we too enjoy and want to protect California's spectacular natural resources. We also support California's climate leadership, but do not agree that our working families and poor should be collateral damage in the state's war on climate. Much as California led the nation in past decades in the involuntarily sterilization aimed primarily at women of color in the name of discredited "science," and unleashed civic "redevelopment" schemes that wiped out once-thriving (and now forgotten) Black and Latino communities in the name of discredited economic theories, we now face demands that new housing consist of small rental apartments located near non-operating bus stops with rental rates of more than \$4000 per month to reduce "Vehicle Miles Travelled" (VMT). California leads the nation in buying, supporting, and ultimately mandating electric vehicles – but VMT housing policy is redlining, pure and simple.

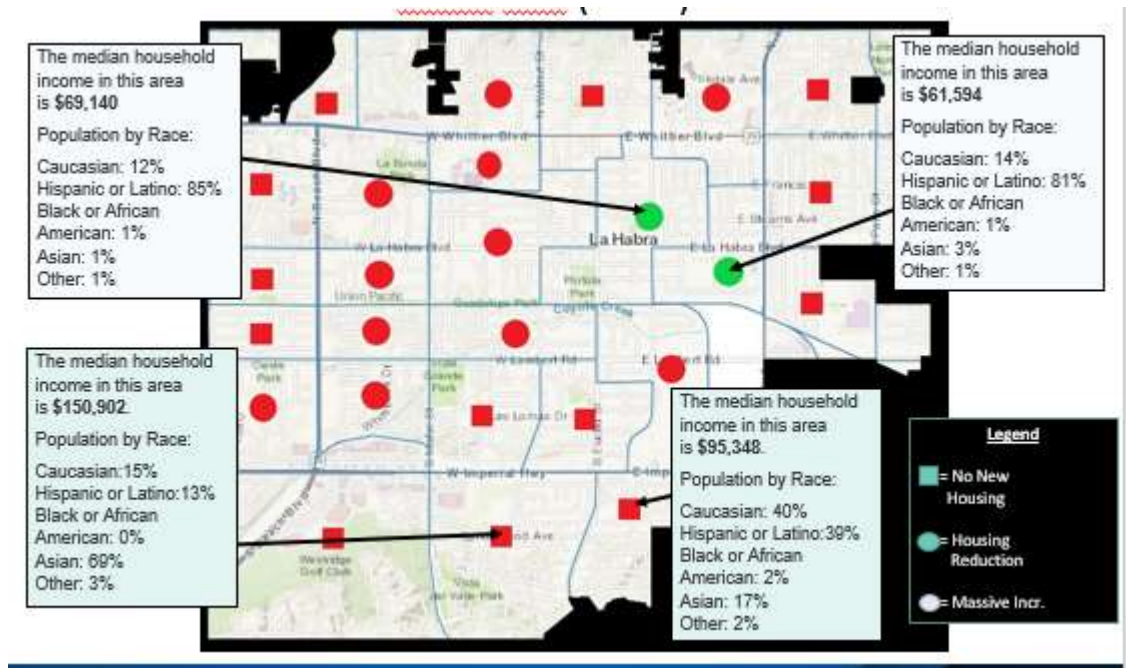
The Southern California Association of Governments (SCAG), which includes 197 cities and 6 counties where collectively the majority of Californians live, was on the verge in 2020 of adopting a VMT-centric regional housing plan that prioritized agency-decreed VMT reductions above all other laws, including federal and state anti-discrimination and housing laws. Under this plan, which conflicted with and undermined almost all city and county General Plans by assuming the massive demolition of existing residential and commercial neighborhoods and replacement with high density apartment housing near planned bus routes, historical and existing residential racial discrimination was intentionally worsened. Figure 2, for example, shows where new housing in Long Beach should be located – noted with green dots in polygons called "Traffic Analysis Zones" (TAZ), which includes many of the most densely-populated, poorest neighborhoods in Long Beach – communities of color highly vulnerable to displacement and gentrification. The TAZ maps showing "red" dots or squares are dominated by single family residences, where even "infill" housing such as townhomes on former strip malls is excluded from SCAG's VMT-reduction housing plan. The "no new housing" neighborhoods are far whiter, and far wealthier, than the neighborhoods slated to receive many thousands of new housing units in a haunting repeat of the "slum clearance" schemes that wiped out minority neighborhoods in years past.

**Figure 2: Long Beach VMT Reduction Housing Plan (SCAG 2020)**



When applied to smaller communities, such as the small town of La Habra in Orange County, SCAG’s VMT-reducing housing scheme was even more blatantly racist. As shown in Figure 3, SCAG decreed that housing belonged in the city’s two poorest TAZ zone neighborhoods – majority Latino – and excluded from the adjacent “nice” homes in nearby hills occupied primarily by Whites and Asians.

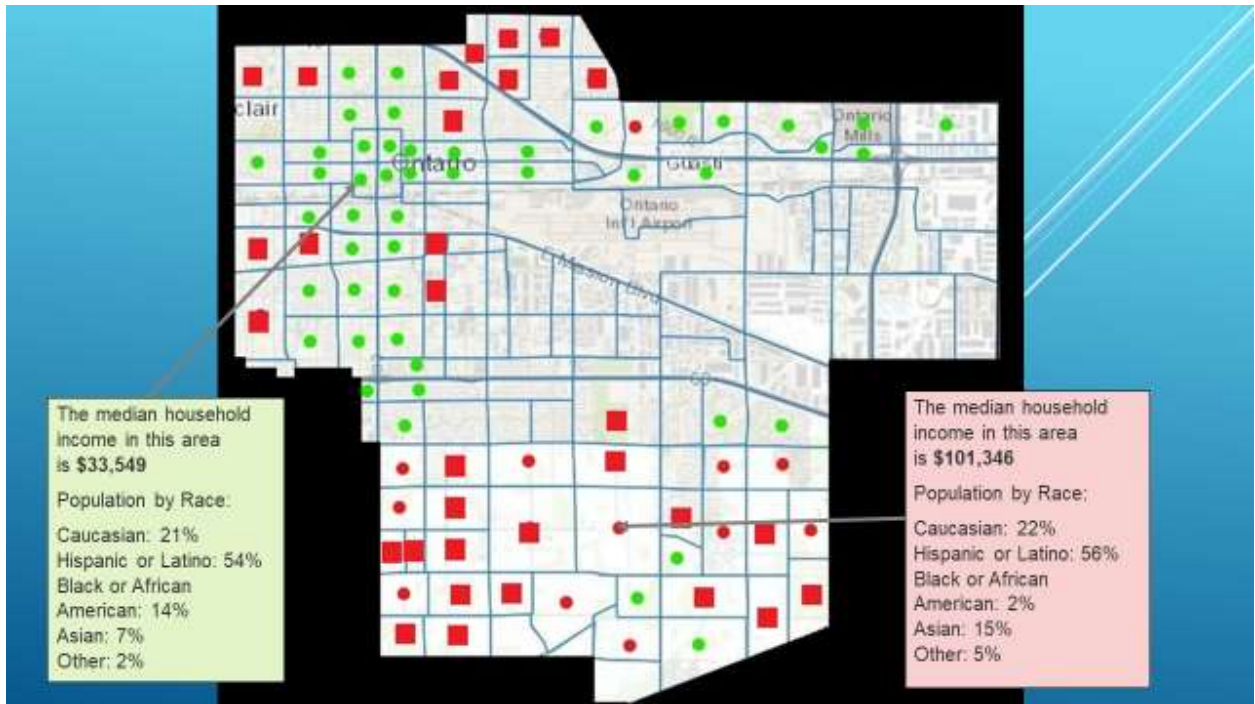
**Figure 3: La Habra VMT Reduction Housing Plan (SCAG 2020)**



SCAG's VMT-based housing plan would also have created new obstacles under CEQA even to the buildout of approved housing. Figure 4 shows Ontario, with new housing planned along a heavily-commercial freeway corridor (Interstate-10) that also has an express bus route, and along another bus route through existing poorer parts of the city that are also near a bus route. (The bus was not operating in 2020, during COVID, and had consistently low ridership even pre-COVID.) The SCAG VMT-based housing plan wanted no more housing built in southern Ontario, which is actually the best selling new community in all of California – with an affordable price for new homes, and a majority Latino and other minority new home purchasers.



**Figure 4: Ontario VMT Reduction Housing Plan (SCAG 2020)**

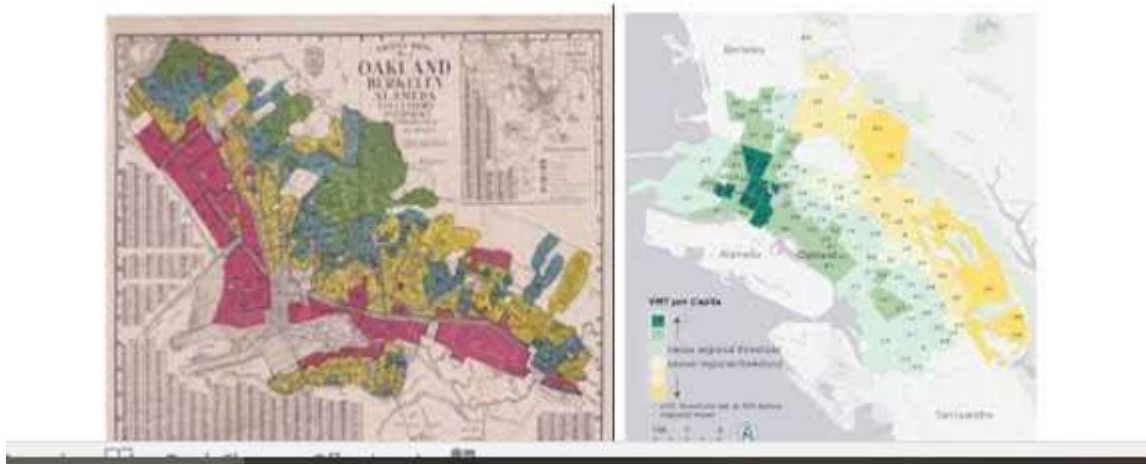


To its credit, when SCAG realized the redlining consequences of its VMT-reduction housing plan, it disavowed the plan and forbade its use in any context (including RHNA and CEQA) in a Regional Council approval Resolution that recognized the “conflict” between California’s housing and climate goals. We can achieve climate goals without worsening racial segregation, demolishing disadvantaged communities (again), and ending attainable homeownership even within existing cities for the majority-minority families that have been shut out of the California homeownership market by catastrophic planning and policy decisions (many brought to us by the same advocates and bureaucrats who invented reducing VMT for electric cars as a “necessary” climate mandate) over the past two decades. In fact, the California Legislature has repeatedly declined to mandate reductions in VMT – and has repeatedly found that the housing crisis harms both existing California residents and exacerbates climate change by driving Californians to worse climate states like Texas to find a house they can afford to buy.

Although the VMT data is most accessible in the SCAG region of Southern California, it is critical that your agency recognize that this same discriminatory outcome occurs everywhere. In Figure 5, for example, we compare Oakland’s historic “redlining” maps where federal bureaucrats refused to approve low cost loans in Black neighborhoods and other communities of color (colored red) with the majority white communities where low cost mortgages were available (colored green and yellow). Oakland’s “low VMT” map (where housing is demanded by today’s special interests based on claimed climate “science”) is the redlined area of Oakland that has already lost much of its historic Black residents, businesses, and civic institutions – the remainder of which would be

wiped out by high density, transit-oriented housing near BART and bus lines. Oakland's "high VMT" map, where housing should not be built, is those lush, wealthy, white, and historically segregated hills.

**Figure 5: Oakland Redlining and VMT Map Comparison**



Both the future of work, and the future of transportation, are in flux. Even before COVID, however, more people were working from home in the SCAG region than riding fixed-route public transit – with bus ridership suffering the most substantial declines. Fixed-route transit ridership plunged during COVID, and has not recovered. VMT has increased over the past month with the re-opening of the state, although peak hour volumes (and trip durations) have diminished. From remote work, to the explosion of new electric technologies for short-distance localized trips, to the massive expansion of app-based rides and carpools, it's important to know what we don't know – which is the future – and what we do know, which as UCLA's transportation experts repeatedly confirmed, is that low income workers rely on low cost used personal vehicles instead of the bus: people can perform multiple trips (drop kids off at school before, carpool kids to soccer after school), and can reliably access more than twice as many jobs in less than half as much time. <https://www.its.ucla.edu/publication/transit-blues-in-the-golden-state-analyzing-recent-california-ridership-trends/>

There are two other inconvenient truths about this VMT-based housing policy civil rights violation.

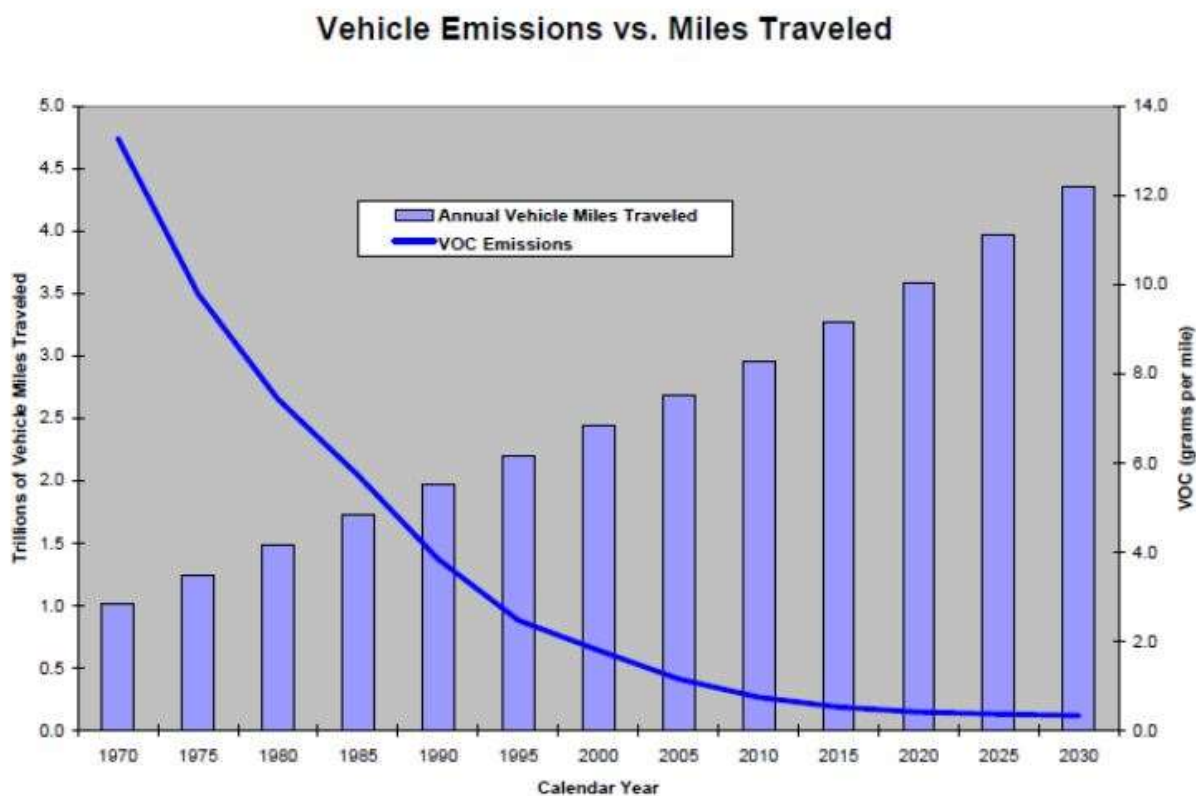
First, there are no proven, or effective, ways of "mitigating" VMT to "below the level of significance" demanded by the state's CEQA lead agency, the Office of Planning & Research (OPR), for unsubsidized housing bigger than about 10 units that is located in a suburban scale existing community not served by high frequency transit. Using the methodology demanded by OPR, San Diego County calculated that the majority of the housing they have approved over the past decade – which helped meet their RHNA housing goals, and had been approved by state climate agencies – would have had significant unmitigated VMT impacts. Again using OPR-endorsed "mitigation" methodologies, for which there is insufficient evidence of effectiveness, San Diego County determined that VMT mitigation fees alone would add \$50,000 - \$690,000 *per housing unit*. San Diego County further acknowledged that it could not meet its RHNA

obligation if this VMT scheme was enforced as proposed by OPR.

<https://bosagenda.sandiegocounty.gov/cob/cosd/cob/doc?id=0901127e80d032bb>

Second, although the purported purpose of this VMT policy is to reduce greenhouse gases, there are many – many – alternatives to imposing a massive car tax on new housing that are more effective at reducing GHG without engaging in racially discriminatory housing policies. When smog was first identified as a problem in Los Angeles during World War II, initially scientists speculated it was a poison gas attack by the Japanese – only to later learn that smog was domestically produced by our own activities. When the Clean Air Act was passed in 1972, the same no growth special interests initially demanded that that cars and other smog sources be banned, but as shown in Figure 6 we instead banned lead in gas, and used catalytic converters and now clean engine/fuel mandates to cut vehicular emissions by more than 98% while VMT – cars driven by actual people to actual jobs etc. – rose steadily alongside population and employment, as reported by President Obama in 2016:

**Figure 6: Reduction in Tailpipe Emissions from Vehicles (line) v. Increase in Vehicle Miles Travelled from Population/Job Growth (bar columns)**



***Civil Rights Solution to Special Interest Exclusionary Housing VMT Scheme: Comply with Civil Rights Housing Laws including Affirmatively Furthering Fair Housing.***  
*The current housing emergency, which disproportionately harms our communities, is not the appropriate forum to “experiment” with a housing density scheme dependent on fixed-route bus ridership and high density, high cost rental housing. Housing locations,*



*densities, and typologies need to match the needs of our communities, including respecting – not just paying lip service – to racial equity and housing civil rights laws we helped enact to create equitable access to the American Dream of homeownership. We have sued the state agencies responsible for this VMT scheme, and the state has been unsuccessful in dismissing our civil rights claims – while engaging in years-long stall tactics like forcing us to file a Public Records Act lawsuit for VMT documents they attempted to hide (a lawsuit we won). VMT is simply a measure of the transportation options – even of 100% clean vehicles – available in a community. It must now be studied under CEQA (at least until our lawsuit is resolved), but it should not distort your Housing Update to worsen residential racial segregation, shield majority-white wealthy neighborhoods from housing in violation of the AFFH laws, and again wipe out our communities in unfunded displacement schemes.*

4. **Paper Zoning for Economically Infeasible Housing is Illegal and Racist.** Partly in response to no growth anti-homeownership schemes like VMT, and partly because existing laws requiring that housing meet the actual needs of actual Californians alive today have become as routinely ignored by academics and bureaucrats as civil rights laws, some cities may be tempted to “solve” for RHNA allocations by assuming that mid-rise and high rise apartments costing in excess of \$4000 in monthly rent for even for one-bedroom units are lawful housing compliance pathways under RHNA. In fact, because that rental rate – and other real life obstacles to lower cost condo development – are entirely unaffordable to median income households, a Housing Element update that assume high cost higher density product types that cost more than 2.5 times more to build than single family homes, duplexes and townhomes as even admitted by an overly-optimistic UCB study that demanded an “all-infill” higher density housing future for California is a violation of housing civil rights law. (<https://www.next10.org/publications/right-housing>) The same study also acknowledged that to accommodate what has only grown to ever more severe housing unit shortfalls, “tens or even hundreds of thousands of single family homes” would need to be demolished to make way for the new high density units. We have seen these academic conclusions before, and we have seen the horrendous outcome of targeting the least expensive – aka neighborhoods housing people of color – and thus least costly/most profitable housing demolition/expensive new housing scheme. What is astounding is how often, whether in the name of openly racist segregation goals, or veiled “public harmony” goals, or “urban revitalization” double-speak, and now special interest NIMBY environmentalism, overwhelmingly white academics, bureaucrats, and hired gun consultant “experts,” keep finding new ways to destroy our communities and deprive our people of the right to achieve the American Dream of homeownership.

These same “experts” have now inserted yet another poison pill into state housing law, which is that when property designated in a General Plan for housing includes economically infeasible higher densities – which in most communities includes even mid-rise six story structures over podium parking – is approved for lower density economically feasible housing types like townhomes, local governments must transfer the unbuilt infeasible units to a different property that must accept even higher densities than included in the General Plan Housing Element update. Because the impacts of that receiving site’s additional spillover housing itself triggers CEQA, an applicant for an economically feasible housing project must also assume the cost, schedule, and litigation burdens of CEQA compliance for whatever unrelated receiving housing site is designated by the city – at an unknown point in the process – to add more density than

allowed in the General Plan Housing Element. Housing Elements that assume non-existent conditions (e.g., repeal of Proposition 13, end of capitalism, vast new tax revenues dedicated to missing middle housing to fund the millions of additional housing units, etc.) are illegal, as are Housing Elements that prescribe economically infeasible higher density housing and fail to plan for the vast majority of “missing middle” and “affordable” housing required by RHNA, are illegal. The San Francisco Bay Area has led the state in assuming that \$4000 per month high rise apartments will be financially feasible in suburbs where median incomes can pay \$1500 for housing – or \$2000 per month for a mortgage. This “paper zoning” of high rise transit-oriented neighborhoods at every bus stop has resulted in a massive out-migration of higher paid Bay Area workers to Stockton and the Central Valley, Salinas and the South Bay, and Sacramento and beyond – which in turn results in unattainable housing prices for those with local jobs in those areas. This paper zoning academic fiction, pursued for more than two decades by some “woke” Bay Area “experts” alongside “urban limit lines” and “ecosystem service taxes” paid by urban residents to non-profit “stewards” of natural lands, is the modern day form of Jim Crow strategies to deprive the hard working families in our communities access to attainable homeownership.

***Civil Rights Solution to Paper Zoning for Infeasible Housing.*** Just don’t do it. Townhomes, stacked flats, quadplexes, garden clusters, and small lot homes are just some of the many examples of lower cost housing that once dominated the “starter” housing market before academics, planners, and special interest no-growthers decided they could intentionally create a housing crisis and nobody would notice because the people most harmed don’t earn enough to donate to political campaigns. Housing densities, and locations, need to be designed for the people who need housing. “Move-up” housing for higher income families forced to rent or spend four times more for a home than they would spend in a neighboring state is also needed. General Plan Housing Element updates should include in the disadvantaged community/environmental justice analysis housing affordability criteria to designate housing typologies, densities, and locations, as well as expedited approval processes, to make new housing needed to meet RHNA targets “affordable by design” so that median income families without taxpayer subsidies or winning lottery tickets can buy a home. As recognized by the Legislature itself, solving the housing crisis will help achieve California’s climate targets by keeping our families here, in new housing that is hugely more energy efficient, and climate friendly, than existing housing or housing built in our competitor states like Texas, Arizona and Nevada. The more new housing (and people) your agency plans for, the lower your per capita greenhouse gas emissions – a feasible, just, and civil rights compliant outcome that will actually help achieve California (and global) climate goals.

When longtime civil rights champion Amos Brown was recently asked whether “the Bay Area is a safe haven for Black people and other people of color” he was unambiguous: “No. . . Since 1970, we have lost Black people who were pushed out of this city. The 70’s Black population was between 15-16%. Well now it’s down to about 4%. That didn’t happen by accident and it wasn’t just economics. This happened because of public policy.”

<https://www.sfchronicle.com/lift-every-voice/article/Amos-Brown-16219697.php>

Beyond the COVID pandemic, 2020 brought us yet another year of race riots and yet another round of rhetoric about the need to “address” the new race avoidance buzzwords of

diversity and inclusion. The time for rhetoric around housing justice should have ended before it started, and we thought for sure was made illegal with the 1960s civil rights laws. We were wrong: as Mr. Brown reports, “public policy” keeps shoving our communities out of neighborhoods that become desirable to white families. Stop it. Just stop it. Comply with civil rights laws, comply with RHNA, and plan for housing that can be purchased by median income households – not just for low income and homeless families, and not just for the wealthy. Housing experts like to call us the “missing middle” – we aren’t missing at all. We just aren’t being seen by housing “experts” and bureaucrats and special interests who get paid by the wealthy to advocate full-time while members of our communities hold down the essential jobs that make communities work. In fact, some sneeringly dismiss us entirely by concluding the “ship has sailed” on homeownership – and yep, communities of color weren’t allowed on the ship, and then got tossed off it with predatory foreclosures, but that’s just too bad we should wait for our lottery ticket to come in and move back into the projects if or when they are ever built.

**Systemic discrimination doesn’t happen by accident – it happens because of bad policy**

Come to your senses. Plan housing for people. Welcome us to your communities, not just to work but to live. Let’s restore our common love for California and build those diverse and inclusive communities your agency, and its advisors and consultants, have been talking about since our country’s racial reckoning last year. Do the right thing, and adopt the right Housing Element and Zoning Code updates.

Please contact me at [robert@thetwohundred.org](mailto:robert@thetwohundred.org) if you’d like to discuss any of this further. We can sue – and we have and will continue to sue to enforce civil rights housing laws – but doing right is by far the cheaper, faster, easier, and just pathway to doing your share to solve the housing crisis.

We look forward to hearing back from you at your earliest convenience.

Respectfully,

A handwritten signature in black ink, reading "Robert Apodaca". The signature is fluid and cursive, with the first name "Robert" being more prominent and the last name "Apodaca" following in a similar style.

Robert Apodaca  
Vice-Chair and Director of Public Policy  
The Two Hundred  
[www.thetwohundred.org](http://www.thetwohundred.org)

From: doug shumway <boatroper@sbcglobal.net>  
Sent: Wednesday, August 11, 2021 1:05 PM  
To: Edwards, Erin <EEdwards@riversideca.gov>  
Subject: Re: [External] Rezoning

Not one of them sounds good for the city I grew up in. You were not raised here and are not from here (Chicago correct?) It sounds like making a bigger mess than what our city is in currently. We are not a big city and don't want to compress more people into it creating more problems. Since you are not from here let me explain...OUR CITY LOOKS REALLY BAD!. Don't vote on making it worse.

Thank you

The Shumway Family

Sent from my iPhone

> On Aug 11, 2021, at 9:56 AM, Edwards, Erin <EEdwards@riversideca.gov> wrote:

>

> Dear Doug,

> Thank you for your comment:

>

> The opportunity sites are listed on page 29 (figure ES2) in the linked document below.

>

[https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/2021/Housing\\_Element/Draft\\_EIR\\_Vol1\\_07\\_19\\_21.pdf](https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/2021/Housing_Element/Draft_EIR_Vol1_07_19_21.pdf)

>

> There are many sites being proposed. Are there any specific sites to which you object?

> I hope you are well,

> -Erin

>

>

> -----Original Message-----

> From: doug shumway <boatroper@sbcglobal.net>

> Sent: Wednesday, August 11, 2021 7:29 AM

> To: Edwards, Erin <EEdwards@riversideca.gov>

> Subject: [External] Rezoning

>

> Erin, this family is against the rezoning opportunity areas that is being proposed. I know you didn't grow up in Riverside but we did! Getting a little tired of this council trying to change our city for the worse.

> Sincerely

> The Shumway household

>

> Sent from my iPhone

cc Mayor  
City Council  
City Manager  
City Attorney  
ACMs  
C&ED Director

**From:** [Andrade, Frances](#)  
**To:** [Nancy Magi](#)  
**Cc:** [Taylor, Matthew](#)  
**Subject:** RE: [External] Hi and question  
**Date:** Thursday, August 12, 2021 4:58:22 PM

---

Thank yo.u I will distribute to the commission.

---

**From:** Nancy Magi <troutquilt@sbcglobal.net>  
**Sent:** Thursday, August 12, 2021 4:57 PM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** Re: [External] Hi and question

Planning Commissioners:

My name is Nancy Magi. I live in Ward 3 at the intersection of Fairview and Central/Alessandro in a single family residential neighborhood. I am asking questions for nearly 700 residents of Ward 3. Victoria Area Neighborhood Alliance and No to 44 Condos.

Before the questions, my statement: You, along with the City Council Members, are our neighborhood advocates. We believe you will consider our words as you face a vote that, if passed, will forever alter the character of our historic City in a negative way. Your vote to move ahead with these proposed revisions to the Housing Element will change single family residential zoning to allow for dense building without notification to adjacent property holders nor will there be an individual hearing as is required now. As we have learned over the last 16 months, the Planning Division's job is not advocacy for the citizens of Riverside.

For example, we only found out by accident that a 2.2 acre lot adjacent to our property line was proposed as a 44 unit project which will require massive engineering and the construction of a 19 foot freeway-style wall in an attempt to provide stability of the granite the builder will need to remove to fit in all of these little units. Initially this property was NOT an Opportunity Site, but in recent months, and in mysterious ways, we learned that its status had been altered which will now allow more units to be built. Thank you to our Council Member Ronaldo Fierro for notifying us of this change. The City Division did not have to make that notification because we were an ADJACENT property holder.

There are 1000 other lots in the city which the Planning Division has identified through mysterious means - most likely electronic and by vague references to "consultants" none of whom live in Riverside as far as we know. This proposal horrible plan will not require adjacent property holders to be notified. And you will be asked to vote to approve or veto that plan on either September 2 or another date to be determined.

As you learn more about the revision of the City Plan, the Housing Element, and the Opportunity Sites today, please consider asking the Planning Division these questions:

- What communication about this mass zoning change was sent BY MAIL to every citizen or at least every homeowner?
- Ask if the Planning Division believes that they have done enough to communicate with

citizens about the massive zoning change.

- Ask how many citizens watched Planning Division videos and asked questions about the Housing Element.
- Ask the Division if they will mail letters to notify property owners adjacent to the 1000 Opportunity Sites stating the City's plan to alter zoning to allow for dense housing/retail.
- Ask if any member of the Planning Division actually visited the sites of the 1000 lots to determine if the property was a genuine fit for dense housing.
- Or were properties chosen via satellite maps with no visitations?
- Ask them to explain in their own words how adding 24,000 dwelling units will impact air pollution.
- How will traffic be impacted?
- Do they believe green space is adequate? One answer to that question is to look at the "green space" at the new apartments on Merrill near Trader Joe's.

Allowing this massive zoning change and building dense housing in our community will be a calamity from which this City will never recover.

To be continued.

On Aug 12, 2021, at 4:47 PM, Andrade, Frances <[FANDRADE@riversideca.gov](mailto:FANDRADE@riversideca.gov)> wrote:

Nothing was attached.

-----Original Message-----

From: Nancy Magi <[troutquilt@sbcglobal.net](mailto:troutquilt@sbcglobal.net)>

Sent: Thursday, August 12, 2021 4:24 PM

To: Andrade, Frances <[FANDRADE@riversideca.gov](mailto:FANDRADE@riversideca.gov)>

Subject: Re: [External] Hi and question

Ok - I have emailed in Pages. If that isn't ok, I will send another way.

Nancy  
Sent from my iPhone

On Aug 12, 2021, at 5:20 PM, Nancy Magi <[troutquilt@sbcglobal.net](mailto:troutquilt@sbcglobal.net)> wrote:

Great solution - thx  
Stand by

Nancy  
Sent from my iPhone

On Aug 12, 2021, at 4:44 PM, Andrade, Frances  
<[FANDRADE@riversideca.gov](mailto:FANDRADE@riversideca.gov)> wrote:

Yes. His comments are included.

Just to let you know there is a limit in the number of characters. It looks like from his comments "to be continued" is not showing in our report.

Your comments were cut off in the middle of the second to last paragraph.

If you would prefer to send me a complete text of your comments, those can be distributed to the commission as well.

-----Original Message-----

From: Nancy Magi <[troutquilt@sbcglobal.net](mailto:troutquilt@sbcglobal.net)>  
Sent: Thursday, August 12, 2021 3:29 PM  
To: Andrade, Frances <[FANDRADE@riversideca.gov](mailto:FANDRADE@riversideca.gov)>  
Subject: [External] Hi and question

If you are able to see the e comments for tomorrow's meeting, could you see if my husbands questions came in? I got confirmation for my comments but he didn't get his? Thx.

Nancy Magi  
Sent from my iPhone  
Keep Riverside healthy: Maintain healthy diet and exercise, wash your hands, and get vaccinated. [RiversideCA.gov/COVID-19](https://www.riversideca.gov/COVID-19)<[http://riversideca.gov/COVID-19](https://www.riversideca.gov/COVID-19)>



Citizens United for Resources and the Environment

TO: HONORABLE PLANNING COMMISSION

RE: ENVIRONMENTAL JUSTICE ISSUES IN PROPOSED HOUSING ELEMENT

Thank you again for providing input.

This letter summarizes some key issues to address environmental justice issues in our community that are worsened by the proposed housing element.

1. No units should be sited cited within 2500 feet of freeways or railroads. Who moves there: the poor!!!! The American Lung Association has long established the impacts particularly on children. Eliminating all units in this area will still allow the City to reach the 18000 goal.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4486117/>

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<https://www.latimes.com/local/lanow/la-me-ln-freeway-pollution-advisory-20171227-story.html>

<https://gustancho.com/buying-home-near-railroad-tracks>

2. Notice how the rich up the hill aren't impacted?

In 2012, the City adopted an EIR with a preferred alternative that required opening Overlook for traffic circulation. This would significantly reduce traffic on Arlington and Central. None of the proposed housing along Central should be approved because the ability for ingress and egress and the increased pollution for individuals living in the vicinity

3. Climate Change is more critical than complying with RHNA

The legislature has adopted conflicting mandates. On the one hand, we are required to reduce Green House Gas reductions, expand green spaces, and ensure poorer communities have more trees. One critical tool for doing so is the application of water for public benefits as the City Council just acknowledged; however, determining how much water is needed and actually allocating that water particularly in poorer communities. The City Council received comments from C-CERT showing how regional logistics expansion will worsen our air quality.

4. This plan does not address Affordable Housing

Most homes will be market based attracting more people to our region who have to drive for jobs. This proposal does not discuss other options to address affordability, i.e. subsidizing rents; converting some apartments to affordable units, or converting unused retail to housing. These options would have fewer environmental impacts but are not thoroughly analyzed.





Citizens United for Resources and the Environment

5. EJ organizations should receive grants to respond

Most non-profit organizations and poorer residents lack the attorneys and technical consultants needed to review, understand and comment. This is an oversight that makes this effort almost meaningless no matter how many public hearings you hold.

CURE intends to supplement its comments as part of this process.



August 13, 2021

MEMORANDUM

TO: HONORABLE PLANNING COMMISSION

RE: WORKSHOP ON DRAFT ENVIRONMENTAL IMPACT REPORT

Thank you for holding a workshop today. Our apologies for the late input; however, we were unaware that an EIR for the Housing Element was circulating. CURE's comments this morning will address some "big picture" issues, and we will supplement those comments once we have the benefit of the presentation.

1. Notice

If the City can send emails to notify residents when trash deliver is late, then they surely can give an e-mail blast out concerning the most critical decision that will affect resident's quality of life. Not everyone mines the website nor uses facebook. In that regard, when special workshops are posted, perhaps the clerk can somehow highlight that on the home page of the COUNCIL/MEETINGS homepage.

2. Timing

The EIR apparently was issued on July 16, 2021, with comments due on September 2, 2021, and final adoption of the housing element in mid-October. This presupposes that there will be NO comments requiring recirculation of the EiR, nor will it give staff or the public a true opportunity to digest and respond to comments. Further, many people (including our City Manager) was on vacation in August or kids are getting back to school. This is the second time the city has adopted consequential "plans" in the past six months ostensibly because of state deadlines that can and should be extended to accommodate meaningful discussion.

3. Engagement

A "workshop" with three minute comments is not "interaction". Nor are powerpoints a true reflecting of what these housing element decisions will mean. First, the public deserves input from experts both who support the City's approach or other possible approaches. Staff instead presents their findings and data, and a public largely ill-equipped to respond to lengthy technical documents is expected to respond. The California Public Utilities Commission has an administrative process that truly allows for engagement with both an office of Ratepayer Advocate defending the public and compensation for qualified intervenors and experts.

Further, the City should provide a 3D model that actually reveals what Riverside will look like if this plan is implemented with the resulting increase in traffic, smog and noise affecting



Citizens United for Resources and the Environment

neighborhoods. The EIR is a drab, unimaginative documents designed to avoid legal challenges and is not a replacement for the kind of analysis the public needs to make choice. Further, the model should specify what the cost of infrastructure will be to support those new units and how, with a structural deficit, the City intends to pay for them.

#### 4. New Information

2020 census information is trickling in now. The City should step back and analyze how this data informs future decisions and how it matches up with assumptions adopted during the last General Plan discussion.

#### 5. Environmental Justice

Putting hundred if not thousands of units within 2500 feet of freeways and railroad tracks is the antithesis of environmental justice and defies all the scientific evidence demonstrating how the lung and brain development of children will be stunted leading to long-term health consequences, learning disabilities and early death. CURE will submit several studies highlighting these problems; however, City Staff and Council already are well aware of the serious air quality, climate and temperature factors that will worsen with growth. There is no mitigation that truly protects units that close to increasing diesel emission. Moreover, poorer people purchase/lease these units, and they are least able to afford high electricity bills to run air conditioning units.

#### 6. Water Availability

If every drop of Riverside's water goes to housing, then perhaps we have enough; however, the urban water management plan and council have acknowledged that Riverside must assess the baseline benefits from trees and green spaces and evaluate how much additional tree planting/ water is needed to combat and adapt to climate. This EIR does not realistically evaluate the limitations of our resources in this area.

The State has countervailing policies to its housing demands. How a court reconciles them remains to be seen. Riverside must maintain its green spaces and tree coverage to protect the public's health and safety. The legislature cannot undermine the City's police powers to do so because it arbitrarily sets housing requirements. Other options to address homelessness and lack of affordable should be considered before worsening the environment in our City.

1  
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Citizens United for Resources and the Environment

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**From:** [Kopaskie-Brown, Mary](#)  
**To:** [Taylor, Matthew](#)  
**Cc:** [Murray, David](#)  
**Subject:** FW: [External] High Density Housing  
**Date:** Tuesday, August 17, 2021 9:48:22 AM

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FYI

Mary Kopaskie-Brown  
City Planner  
City of Riverside  
[mkopaskie-brown@riversideca.gov](mailto:mkopaskie-brown@riversideca.gov)  
(951) 826-5108

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**From:** Zelinka, Al <azelinka@riversideca.gov>  
**Sent:** Tuesday, August 17, 2021 9:38 AM  
**To:** CMO CM-ACM-DCM <CM-ACM-DCM@riversideca.gov>; Kopaskie-Brown, Mary <MKopaskie-Brown@riversideca.gov>; Welch, David <DWelch@riversideca.gov>  
**Cc:** Norton, Phaedra <PNorton@riversideca.gov>; Beaumon, Anthony <ABeaumon@riversideca.gov>  
**Subject:** FW: [External] High Density Housing

FYI

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**From:** [brush2roll@aol.com](mailto:brush2roll@aol.com) <[brush2roll@aol.com](mailto:brush2roll@aol.com)>  
**Sent:** Tuesday, August 17, 2021 9:20 AM  
**To:** Cervantes, Cindy <[CCervantes@riversideca.gov](mailto:CCervantes@riversideca.gov)>; Zelinka, Al <[azelinka@riversideca.gov](mailto:azelinka@riversideca.gov)>; [ccondor@riversideca.gov](mailto:ccondor@riversideca.gov); CityClerkMbx <[City\\_Clerk@riversideca.gov](mailto:City_Clerk@riversideca.gov)>; Edwards, Erin <[EEdwards@riversideca.gov](mailto:EEdwards@riversideca.gov)>; [gplacencia@riversideca.gov](mailto:gplacencia@riversideca.gov); Perry, Jim <[JPerry@riversideca.gov](mailto:JPerry@riversideca.gov)>; Gonzalez, Larry <[LGonzalez@riversideca.gov](mailto:LGonzalez@riversideca.gov)>; [pldawson@riversideca.gov](mailto:pldawson@riversideca.gov); Fierro, Ronaldo <[RFierro@riversideca.gov](mailto:RFierro@riversideca.gov)>; Hemenway, Steve <[SHemenway@riversideca.gov](mailto:SHemenway@riversideca.gov)>  
**Subject:** [External] High Density Housing

**City Government:**

**I want you know that I am *OPPOSED* to high density housing in Riverside.**

Having grown up in Berkeley California, a city that has high density housing intermixed with single family residences, I know first hand the problems that are associated with zoning changes.

I lived in a house that sat in the front of the lot with a six unit apartment on the back of the lot. Try getting a good nights sleep with cars coming and going all night. The affect on air quality is a

major concern as is parking, traffic, noise, crime etc.

Don't ruin a great city by loading with renters.

Sincerely,

Ronald Todar

Keep Riverside healthy: Maintain healthy diet and exercise, wash your hands, and get vaccinated. [RiversideCA.gov/COVID-19](https://www.riversideca.gov/COVID-19)

**From:** [Andrade, Frances](#)  
**To:** [Taylor, Matthew](#)  
**Subject:** FW: [External] Zoning changes  
**Date:** Wednesday, August 18, 2021 11:13:52 AM

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**From:** Holly Clark <hollclrk@gmail.com>  
**Sent:** Wednesday, August 18, 2021 10:52 AM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] Zoning changes

Hello,

I purchased my house in the Wood Streets neighborhood in 2004. Because of the nature of our houses and lots, there are some ADUs already. We also have single car driveways (if any driveway at all), so many of us rely on street parking for our 2nd cars.

My immediate nextdoor neighbor has a double wide driveway, that up until last month (so, 10+ years of this) had 7-9 cars parked in and around. Some cars were non functional, but the result was the same. Basically a used-car parking lot situation that resulted in them blocking the sidewalk, as well as taking up more than their fair share of street parking.

Given the number of adults that were living in that house for so many years, I can easily imagine a similar situation with the proposed zoning changes. This will negatively impact our neighborhood greatly.

Not to mention, we already have sewer issues in the wood streets, given how old the city infrastructure is. We cannot accommodate adding so many people to our neighborhood.

I understand that there are state mandates involved for adding affordable housing, but I think the approach needs to be very surgical in nature, taking into account neighborhood characteristics and abilities. The current residents cannot be cast aside for new residents. I bought my house in an established neighborhood so that I knew EXACTLY what I was getting into - I never considered houses near vacant lots for this exact reason.

Please feel free to reach out.

Thanks,  
Holly Clark

Keep Riverside healthy: Maintain healthy diet and exercise, wash your hands,  
and get vaccinated. [RiversideCA.gov/COVID-19](https://www.riversideca.gov/COVID-19)

**From:** [Andrade, Frances](#)  
**To:** [Randall Hord](#)  
**Cc:** [Taylor, Matthew](#)  
**Subject:** RE: [External] Planning Counsel  
**Date:** Wednesday, August 18, 2021 1:59:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Do you want it handed out tomorrow or at the September 9<sup>th</sup> meeting when this will be heard?

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**From:** Randall Hord <Randall.Hord@RaymondJames.com>  
**Sent:** Wednesday, August 18, 2021 1:23 PM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] Planning Counsel

Hi Frances,

Could you please place a copy of this email in each planning commissioner's packet for the meeting tomorrow:

Members of the Planning Commission:

First, thanks for what you do, through this process I have begun to realize that city planning staff represent the builders and it seems there are very few who actually represent the citizens of our town. I attended the PC meeting last week and I'll put it nicely and say it was eye opening. Our neighborhood group (Victoria Area Neighborhood Alliance) have been fighting the proposed 44 condo project on Central and Fairview for almost two years now. Conveniently this same site has now been added as one of their opportunity sites. This is surely why the developer has stopped submitting plans, he's just going to wait until this housing element goes through then we will have no say in the matter. I would hope there might be a way to carve it out, at least give us a chance for a fair fight. I'm not sure any of them have driven Central lately but it's insane the amount of traffic with delivery vans and 18 wheelers flying down it daily. In just a ½ mile stretch of Central where the 44 condos are proposed that are 3 pre-schools, 1 elementary school and 1 high school. And along with the 44 proposal they have added two other "opportunity sites" that would add another 200+ apartments. So I have a few thoughts:

- When is enough enough, will there ever come a time when they consider the safety of our citizens on this street, accidents happen here almost daily, how many deaths are enough?
- What I took from last weeks PC meeting:
  - The state says they have to submit the housing plan every 5 or 8 years. And our staff are CHOOSING to do it for 8 years simply because they don't want to have to do in another 5 years. This is a joke right? That's exactly what they said. How about they think of what's best for their city and not their job, it is what they get paid for after all. And wouldn't a 5 year plan equate to less housing sites needed?
  - We are required to identify roughly 18K units but they are CHOOSING to do 23k and possibly up to 31k??? Again, this must be a joke. Why in the world if you are having concern from your actual citizens about the density would you just choose to do 30%+ more. They can go on and on about the numbers they think won't actually get done but the STATE asks for 18k so give it to them.

- No answer that I heard that was reasonable about the lack of water resources in our town not to mention our state....they have heard of our problems right?
- They stated the density would result in less vehicle miles on our roads...again, straight from the meeting. How exactly would that happen? Do they think we are in NYC? Chicago? LA? All of the sudden the empty busses and trollies around town would fill up. Someone needs to have them realize exactly where we live.
- Probably the biggest eye opener for me was how they said they communicated this with the public. In my opinion Planning department were given a break with COVID, an excuse to ram this stuff thru without really needing to tell anyone until it's too late. Some of the laughable communication tactics they mentioned:
  - Letting City Counsel know and hoped they would get it out via word of mouth, sure that will happen. From what I hear most of counsel are in favor of this
  - Social Media: Like people are following City Planning on Facebook etc.
  - 2 City billboards.....seriously, 2
  - Planning also said they let their "stakeholders" know. Do they think were dumb, some of us realize their stakeholders is another word for DEVELOPERS who we all know sure don't have a problem with adding density.
  - Last and I mentioned it during my 3 minutes, as I was sitting there I received what seems to be a regular email about my trash being picked up a day or so late. Odd to me, it is regularly communicated to my that my trash will be late but a plan that is going to change our town forever is buried in city websites.

Again, none of this is a reflection on you or the job you do, it's staff and the counsel that worries many of us. There's a groundswell of momentum coming, people are starting to realize what's happening. Unfortunately the only way most people are realizing now is because residents like us are letting them know.

This is being rammed down our throats and I know they can tell the state they need a delay but they just don't want to.

Please help us stop this madness.

And feel free to reach out to me at any time.

Thanks,

Randy

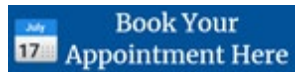


*Randall D. Hord, MBA, PPC®*  
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**From:** [Andrade, Frances](#)  
**To:** [Taylor, Matthew](#)  
**Subject:** FW: [External] Please print and place in each commissioners packet  
**Date:** Wednesday, August 18, 2021 11:14:14 AM

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**From:** jlkafamily <jlkafamily@aol.com>  
**Sent:** Wednesday, August 18, 2021 10:46 AM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] Please print and place in each commissioners packet

Dear Board,  
Please reconsider your plan to put in housing without regards to neighbors, neighborhoods, and parking in all wards. This is not okay to take away peoples property or bring down their hard earned housing. Please take another look at what you are doing. Planning department needs to actually sit down and plan instead of making a hurried decision that effects peoples lives, livelihoods, and houses.  
Mrs. Ludwig

Sent via the Samsung Galaxy S21+ 5G, an AT&T 5G smartphone

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**From:** [Andrade, Frances](#)  
**To:** [Taylor, Matthew](#)  
**Subject:** FW: [External] SMART thinking on the massive zoning change  
**Date:** Wednesday, August 18, 2021 9:40:05 AM

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**From:** Nancy Magi <troutquilt@sbcglobal.net>  
**Sent:** Wednesday, August 18, 2021 9:34 AM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] SMART thinking on the massive zoning change

Frances, please include copies of this email in the Planning Commissioners' packets. Thank you

August 18, 2021

## Members of the Planning Commission:

Questions regarding the 1000 Opportunity Sites-

- How were these 1000 Opportunity Sites chosen?
- Did anyone WALK on the chosen properties to determine their "fitness" for dense housing?
- In actuality, were these sites chosen by looking at satellite maps?
- Were builders a significant source of site selection?
- What notification did adjacent neighbors to these sites receive?
- Are you comfortable in a decision to approve this plan knowing that the vast majority of our citizens do not even know about this proposed massive change to our community?
- Do you believe the Planning Division when they say they will not "necessarily allow building" on each site given the potential zoning change?
- Do you believe, if the zoning is changed on these 1000 lots happens, that it can be changed back?

An example to consider and how many more like this one are there-

Three Opportunity Sites within a single mile range from Fairview to the entrance of Olivewood Cemetery:

By the City's own estimate, **a total of 444 dwelling units are proposed in this mile long corridor** which also includes 5 schools and 4 places of worship. This total figure is determined by reviewing the Housing Opportunity Site Information Tool and the RHNA Housing Element Opportunity Site Inventory.

1 - Possible **200** dwelling units at the Church on the Hill on an estimated 10 acres with 400 more cars. Is anyone concerned about traffic safety, dense traffic, and sufficient parking?

2 - Proposed **44** dwelling units on 2.2 acres with 88 more cars  
Is anyone concerned about traffic safety, dense traffic, and sufficient parking?

3 - Possible **200** units on 8 acres comprised of a place of worship and three residential properties adjacent to Olivewood Cemetery. Potential for 400 cars. Is anyone concerned about traffic safety, dense traffic, and sufficient parking?

Residents of this corridor have requested accident statistics 4 times and have been ignored. Why can we not receive those statistics? We have seen the crashes, broken light poles, trees cut in half, multiple emergency vehicles, and fatalities. We want to see the stats.

Please walk the properties. Please talk with the residents.

Do you know the Opportunity Sites in the Ward you represent? Are those sites SMART decisions for growth?

We must slow down the process and look at each site. Some are SMART and some are very foolish.

Our fellow citizens do not know this massive zoning change is happening- they must be notified by mail and by various other city wide means - for example, the manner in which we are told about trash pick up delays.

Once again, ask how individual citizens were notified? Answer: Totally electronic.

Please consider this decision thoughtfully. Approval of the hundreds of housing sites on Central/Alessandro corridor sites is just **one example** of irresponsible lot choice.

## **Where are similar sites in your Ward?**

Nancy Magi

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**From:** [athena waite](#)  
**To:** [Taylor, Matthew](#)  
**Cc:** [Nancy Magi](#); [Tricia Hord](#); [Randy Hord](#); [Duffy Atkinson](#); [Frank Byrne](#); [Annie Patno](#); [Connie Decker](#); [Jane Rodrigues](#); [Warren Avery](#); [Alan Shelley](#); [M. Watts](#); [Michelle Brown](#); [Molly Shah](#); [Steve Lech](#); [mailedog@sbcglobal.net](#); [Steve Gerdo](#)  
**Subject:** Re: [External] Slow down the process  
**Date:** Thursday, August 19, 2021 1:04:39 PM

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Hello, Matthew,

Nancy and Enn speak for many of us in the Victoria Woods neighborhood and beyond. I'm beginning to feel that nothing we say is taken to heart by the planning commission and others. To be clear, we are not NIMBYs or anti development. We are against building 44 condos on the steep, limited space at the corner of Fairview and Central. There are serious traffic concerns; note the many accidents occurring in the short distance from Falkirk to Chicago and especially around the Fairview area.

Many students walk to one of the three or four schools in the area. The 44 Condos is sure to bring an increase in traffic speeding through the side streets to avoid the Central Avenue gridlock. Making our neighborhood a traffic hazard and endangering the children doesn't make sense.

Try driving from the freeway to Chicago on any weekday between 8:00 A.M. and 9:30 A.M. or 3:30 P.M. to 5:30 P.M. and note the congestion even now and think how much worse it will be with 44 condos and whatever may be built on the Church on the Hill church property.

I won't reiterate the concerns and questions Enn clearly stated in a previous email. Certainly city services and infrastructure will be challenged.

Our objective is not to make your work-life difficult, but to preserve the integrity and safety of the people who live in our neighborhood. Please try to work with us and take into consideration all of our concerns. Surely there are better lots and areas to satisfy the state's requirement for more housing.

Sincerely, Athena Waite  
2151 Fairview Avenue

On Wed, Aug 18, 2021 at 8:56 AM Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)> wrote:

Good morning Nancy

Thank you for your email. We understand and appreciate your perspective.

Unfortunately, we have explored extensions from the State and at this time, October 15 is the deadline. Please feel free to continue to voice your concerns at the Planning Commission and City Council meetings.

Thank you,

**Matthew Taylor | Senior Planner**

951.826.5944 | [mtaylor@riversideca.gov](mailto:mtaylor@riversideca.gov)

## City of Riverside

Community & Economic Development Department

Planning Division

3900 Main Street | 3<sup>rd</sup> Floor | Riverside 92522

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-----Original Message-----

From: Nancy Magi <[troutquilt@sbcglobal.net](mailto:troutquilt@sbcglobal.net)>

Sent: Sunday, August 15, 2021 10:57 AM

To: Taylor, Matthew <[MTaylor@riversideca.gov](mailto:MTaylor@riversideca.gov)>

Cc: Tricia Hord <[triciahord@yahoo.com](mailto:triciahord@yahoo.com)>; Randy Hord <[bigbor8686@yahoo.com](mailto:bigbor8686@yahoo.com)>; Duffy Atkinson <[datkinson1@att.net](mailto:datkinson1@att.net)>; Frank Byrne <[frankbyrne1963@gmail.com](mailto:frankbyrne1963@gmail.com)>; Annie Patno <[apatno@gmail.com](mailto:apatno@gmail.com)>; Athena Waite <[athena.waite22@gmail.com](mailto:athena.waite22@gmail.com)>; Connie Decker <[conniedecker08@gmail.com](mailto:conniedecker08@gmail.com)>; Jane Rodrigues <[Janemrodriguez@gmail.com](mailto:Janemrodriguez@gmail.com)>; Warren Avery <[warrenavery14@gmail.com](mailto:warrenavery14@gmail.com)>; Alan Shelley <[Royalinns@yahoo.com](mailto:Royalinns@yahoo.com)>; M. Watts <[mwatts47@gmail.com](mailto:mwatts47@gmail.com)>; Michelle Brown <[michbrown@att.net](mailto:michbrown@att.net)>; Molly Shah <[meh240@gmail.com](mailto:meh240@gmail.com)>; Steve Lech <[rivcokid@gmail.com](mailto:rivcokid@gmail.com)>; [mailedog@sbcglobal.net](mailto:mailedog@sbcglobal.net); Steve Gerdo <[sgerdo@hotmail.com](mailto:sgerdo@hotmail.com)>

Subject: [External] Slow down the process

Matthew- We MUST focus on SMART development. We need citizen groups to review EVERY proposed Opportunity Site by Ward. Each empty/redevelopment lot arbitrarily selected by the Planning Division needs eyes on by neighborhood groups.

Some are perfect for development - some are not SMART choices.

Nancy Magi

Sent from my iPhone

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## Citizens United for Resources and the Environment

August 29, 2020

To: Honorable Planning Commission

Re: Public Comment Regarding RHNA Deadlines

CURE urgently recommends that the Planning Commission call upon the Mayor, City Attorney, and our state elected officials to convene a meeting in Sacramento to explain in detail why the October 15, 2021 deadline, cannot be met without violating the time requirements of CEQA as well as the due process clause of the State and federal constitutions. CURE recognizes the City failed previously to timely comply with RHNA; however, new information and the unique circumstances confronting Riverside necessitate our city coming together to resist jumping off a cliff with no soft landing.

### 1. Timing

Staff has confirmed that between September 2 and 9, 2021, they cannot provide written responses to Draft EIR comments and propose a final EIR to the Planning Commission. They are claiming that only the City Council must approve the final and are assuming that there will be no need to recirculate the EIR. This “cram down” violates the letter if not the spirit of CEQA and prevents this body and the public from an opportunity to provide meaningful input so that our elected officials understand the consequences.

### 2. Staff misrepresented that future projects return to the PC

CURE clarified that staff is (1) proposing simultaneous zoning ordinances which would allow administrative approval of projects under 50,000 once they are included in the Housing Element. Those projects are “by right” so that there will be no more review by the PC or appeal process for the public. Worse yet, staff has not finalized the ordinances for public consumption that will go before you and council apparently on the same schedule as the final EIR. No one has the capacity to keep up with what’s happening and the illusion this constitutes “notice” is offensive.

### 3. The proposed 31,000 houses is far beyond what the law requires.

RHNA requires approximately 18,500 houses. Staff acknowledges their goal of 31,000 or even 24,000 is not required by law. They are doing this for a matter of convenience so that, if we fall below 18,000, they don’t have to come back for new zoning. That policy decision should be made FIRST by the city council and not by staff.

### 4. The new Census Numbers reflect less population growth than anticipated.

Because we are only getting new census information, it is unclear how this affects the underlying assumptions. This alone justifies a short 60-90 extension by the state.

### 5. The DEIR fails to acknowledge significant unmitigated impacts on water and impacts to infrastructure including the financing needed to upgrade.

CURE appreciates the comments/questions of the Commissioners at the last meeting. We will submit expert input on this shortcoming before September 2.

**From:** [jpm@myerslaw.net](mailto:jpm@myerslaw.net)  
**To:** [Taylor, Matthew](#)  
**Subject:** [External] MESSAGE TO THE CITY OF RIVERSIDE CITY COUNCIL, PLANNING COMMISSION AND MAYOR -  
**Date:** Tuesday, September 7, 2021 7:14:59 PM

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TO THE PLANNING COMMISSION AND CITY COUNCIL OF THE CITY OF RIVERSIDE

I own a small converted residence which serves as my office. It is located at 4048 10<sup>th</sup> Street. Thus, it came to pass that I received the "Special Notice for the Downtown Neighborhood", sent on or about August 24<sup>th</sup>. Because I was utterly unable to determine where, exactly, my property was on that map, I turned to the City's website to view the map with greater detail. Other than being able to note the approximate location of my building on that map, I turned to the website suggested to see if it could be made visible – or intelligible. Alas, that has proved impossible. Not simply because of the detail (which remained unclear at best) but because of the string of "guides" for the meaning of the colors presented – particularly on the website where they were listed.

My belief is that the map, as presented online, was deliberately designed to confuse or hide the actual Plan, and to mislead the public and those property owners directly concerned. It does not clearly educate, nor explain, nor depict the goals of the proposed "Update" of the downtown area.

The Planning Commission has been quite active in recent years, culminating in a number of questionable projects focused on housing, rather than the character and atmosphere of our City. As examples, huge parking structures and lots north of 14<sup>th</sup> Street; or the destruction of the nature of the downtown mall. The "Ninth Street Prison" complex is an example of the utter lack of design, or consideration of space, or the effect of a monstrous building on those who have businesses – or simply want to walk about – on an actual mall located in the Downtown area. (Your using the threat of somehow abusing "environmental justice" by destroying the physical character of this City is more than somewhat reprehensible.)

Apart from nurturing the creation of a fantastic Library building, or the wonderful structure at Lime and University built by Mr. Rubin and his architects, showing how a high-rise building can fit the traditional architecture of Riverside (like the Mission Inn, the Fox Theater, the Art Museum, and other similar places) you have promoted and permitted structures which are completely inconsistent with the architectural tradition and "feel" of Downtown Riverside. And, to be blunt, a number are just artistic "junk."

The "Opportunity Sites" presented are simply left undescribed in any way, other than apparently adding a very large number of people to the City – and create destruction of a rare place in Southern California which is so different from the City in which we live and work. You have an obligation to respect what we have that is beautiful, including the spaces which we can enjoy, and not allow Riverside to simply become a "blip" in the mass of Cities which seem to make life less pleasant than ours has.

I came to Riverside in 1970 because I wanted to work and live in the same place, to have schools and parks and other activities for our children at which my wife and I could participate. Not to live in a

place with no history, no tradition, and no unique qualities or opportunities for a full life.

Finally, your excuses for taking action and creating a “Plan” for the Downtown Neighborhood(s) ring false. There is no real improvement in “Public Safety” when you increase the population of an area. (The concept is best illustrated by old sociological and zoological experiments with rats – crowding them in small spaces until fear, tension, and violence emerge.) Almost nothing is gained by the “Plan” suggested, however hidden it seems to be. Yet, there is much to lose.

You have provided a supposed “Notice” of a drastic action “which must be completed by October 15<sup>th</sup>” More than a little late to let the people of Riverside know what is proposed – and with no information or evidence that the little colored squares or triangles (they are, sadly, far too small to interpret) will fulfill any of the responsibilities which the State has apparently imposed.

I urge those who represent the People of Riverside in Planning and in finding a way to enhance the obligations of government to reject the supposed plan so poorly explained or illustrated. I forwarding these thoughts to our new Mayor and to the Members of the City Council, hoping that all who receive it will consider carefully.

Sincerely,

Joseph Peter Myers



**From:** MELANIE MILLER <flygirlmel1@sbcglobal.net>  
**Sent:** Monday, August 30, 2021 8:57 PM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] Housing Element

Richard L. Kirby-Chair, Ward 1, Christine L. Roberts, Ward 2, Todd D. Ridgway, Ward 3, Jonathan K. Parker, Ward 4, James R. Rush, Ward 5, Larry E. Allan, Ward 6, Raj K. Singh, Ward 7, Judy Tenuissen-Vice Chair-Citywide, Ward 3, Andrew P. Villalobos-Citywide, Ward 1

This is in reference to the absurdity of trying to push High Density Multi-Unit Housing into any and all residential areas of Riverside City and County. The infrastructure of the city especially, will not support all of this extra housing. Sewer lines, water, electric, and traffic will overpower the areas and cause great angst for everyone. Further more, you are not/have not adequately informed the residents of said areas, via letters or flyers, of your intentions. The negative impact to the uniqueness of the wood streets, in particular, will be profound. A supposed mandate from Sacramento does not give you free rein to ramrod construction throughout the city/county. A yes vote will destroy the history of this city and what little integrity the city council and planning commission may have.

Date: 8/20/21

From: Kevin Pope, Laura Pope, Gayle Morrison

To: Riverside Planning Commissioners: Judy Teunissen, Larry E. Allen, Christine L. Roberts, Andrew P. Villalobos, Raj K. Singh, Todd D. Ridgway, Jonathan K. Parker, James R. Rush, Richard L. Kirby

Subject: **Written Request to Remove APN 233150019 From Opportunity Site List**

COPY

My name is Kevin Pope. On behalf of myself and my family, who own the property, I'm writing this letter to oppose the general plan redesignation and rezoning of our property located at 3315 Van Buren Blvd, Riverside, CA 92503 (APN 233150019).

During the 8/13/21 planning commission meeting, Commissioner Jim Rush asked Matthew Taylor how a property owner can request to be removed from the opportunity site list if they oppose their redesignation/rezone. Matthew Taylor explained that the owner should make such a request known to the Planning Commission, and that the Planning Commissioners have the authority to remove sites. This letter is our formal written request.

For the past several years I've worked at Brookhurst Mill, which has been located on this site since 1959, spanning four generations of family ownership. In March of this year, we made the difficult decision to close the doors, as the demand for commercial animal feeds continues to decline in southern California. We've watched this trend for decades, and knew that our time operating the mill would eventually come to an end. We often discussed what we would do with the property after the mill closure, usually landing upon leasing it out to businesses that could make use of the existing buildings and infrastructure on site.

Immediately after closing the doors in March, we began deconstructing Brookhurst Mill and preparing the site for 3 separate commercial tenants, in accordance with our current industrial zoning. We were well underway with this process and had already sunk tens of thousands of dollars into this project when we received notice in late May that the City planned to redesignate and rezone our property to attempt to turn the site over to residential uses.

I'd like to point out why this site is not well suited for housing, and should be removed from the opportunity site list that is scheduled to be voted on in October by City Council. The site shares a property line on all four sides by industrial uses. Automotive repair shops to the south. A business manufacturing park to the east. A new tilt-up warehouse to the west. And two highly active rail lines, BNSF freight lines and Metro link within 15 feet of the property line to the north. The site is over 2 miles from the La Sierra metrolink station, not within walking distance to public transit. That's not to mention the constant homeless and drug problem along the railroad tracks next to this property. Two encampments have already been hauled away by railroad police this year. And for what it's worth, historically speaking, the East side of Van Buren has always been zoned for business use (like us), while the west side of Van Buren has allowed for housing.

Additionally, I'd like to mention the extremely short notice given. I was notified by mail in LATE MAY 2021 of this proposed redesignation and rezone. That gave us less than 5 months to do anything about it before the October vote. And in the meantime, we've already sunk thousands and thousands of dollars into preparing the property for commercial tenants, according to our current zoning! Given that we shut down mill operations, there was no legal non-conforming use to continue. A redesignation would result in our family being housing developers as we have no plans to sell the property. Significantly, the land use change would leave two adjacent parcels containing a rail spur valueless. These parcels only have value as appended to an industrial land use.

Our desire is simple; we want to maintain the zoning we've had for over 60 years. We're not just trying to be obstinate or anti-development. We understand that responsible development is good for everyone. But when you actually look at our location specifically, you'll see it is not well suited for housing, and maybe that's why it's surrounded on all four sides by commercial and industrial uses, not housing. The companies scheduled to soon move into the property are very stable, longstanding companies with excellent reputations, bringing jobs and growth to Riverside.

Lastly, I'd like to point out that we've been highly engaged through this whole housing element process. During my time dialoging with City staff and speaking at City Council and Planning Commission meetings, not once have I heard from another property owner opposing their rezoning. So I would think it's a short list of people who want to be removed, and I'd like to be the first. We understand that City staff has purposely built in a buffer, albeit a narrow buffer, to their opportunity site list because they know some sites may not pass muster, so I kindly ask that you exercise your authority to remove this property for all the reasons stated above. I can be reached at 951-892-5499 or kevincpope@gmail.com.

Thank you for your understanding. -Kevin Pope, Laura Pope, Gayle Morrison

**From:** Nancy Castle <nccastle@icloud.com>

**Sent:** Tuesday, August 31, 2021 8:43 PM

**To:** Andrade, Frances <FANDRADE@riversideca.gov>

**Subject:** [External] e-Comment for Agenda Item 2 PLANNING CASE PR-2021-001058 on 9/9/21

Hello,

This e-comment is for the opposition of a proposal to rezone an adjoining parcel, APN 253-210-051 which is Site ID 120 of the Residential Sites Inventory in Ward 2, to our complex at 5050 Canyon Crest. It is located on the corner of Canyon Crest Drive and El Cerrito Drive. As a resident of the The Crest HOA located at 5050 Canyon Crest Drive, I OPPOSE rezoning of that particular parcel of land to R-4, as I believe there is already way too much traffic, noise pollution and activity in our area. I understand there is not yet a specific development proposal for that parcel. There are already a large number of multi-dwelling housing facilities on Canyon Crest Drive (on the other side of El Cerrito Dr), and do not believe rezoning this parcel for higher density housing is good for our neighborhood, nor our city.

Thank you for your serious consideration of this opposition request.

*Nancy Castle*

Sent from my iPad

**From:** crista curtis <crista\_curtis@hotmail.com>

**Sent:** Tuesday, August 31, 2021 5:01 PM

**To:** Andrade, Frances <FANDRADE@riversideca.gov>

**Subject:** [External] e-Comment for Agenda Item 2 PLANNING CASE PR-2021-001058 on 9/9/21

Hi - I am a resident of The Crest HOA located at 5050 Canyon Crest Drive, next to APN 253-210-051 which is Site ID 120 of the Residential Sites Inventory in Ward 2. That 0.65 acre parcel is located next to us, and is on the corner of Canyon Crest Drive and El Cerrito Drive. I OPPOSE rezoning of that particular parcel of land to R-4, as I believe there is already way too much traffic and activity in our area. I understand there is not yet a specific development proposal for that parcel. There are already a large number lower income apartments on Canyon Crest Drive (on the other side of El Cerrito Dr), and do not believe rezoning this parcel for higher density housing is good for our neighborhood, nor our city. Thank you.

Crista A. Curtis

951.830.5215

From: Enn Magi <ennmagi@sbcglobal.net>  
Sent: Tuesday, August 31, 2021 1:59 PM  
To: Andrade, Frances <FANDRADE@riversideca.gov>  
Subject: [External] Letter of concern re: Opportunity Sites

Hello Frances,

Attached is my letter to Council Member Fierro regarding our concerns with three proposed Opportunity Sites along our Ward 3 Alessandro/Central corridor. Please copy and distribute it in all of the Planning Commissioner's packets pending the September 9 evening meeting. Thank you.

Regards,

Enn Magi

Greetings Ronaldo,

While we at No on 44 remain committed to our concerns specific to the proposal at 2201 Fairview, we wish to express our opposition to the three Opportunity Sites along Alessandro/Central (that include 2201 Fairview) and their zoning changes proposed by Planning in the Housing Element rewrite. This proposal could result in a ten fold increase in housing units compared to the 2201 Fairview proposal already in consideration with potentially greater serious consequences for our community and already impacted commuter corridor with its increasing traffic load. Please consider the following points:

> City Planning has identified and published their "realistic" estimate that the three sites would total an increase of 443 housing units, the equivalent of a 443 housing development directly located on Alessandro/Central.

> At a conservative estimate of just two persons per household, this would result in adding nearly 900 residents facing the corridor and their multiple vehicles directly on to the corridor.

> Our corridor is already essentially built out and is dedicated to serving single family homes, places of worship and several schools.

> Along the course of one mile including the proposed Sites, we have four places of worship, two with preschools and one with an elementary campus, and Alcott Elementary and Poly High School, all concentrated in close proximity.

> All of our homes and our abundant public community resource locations are almost entirely automobile dependent, and so would be the proposed higher density Opportunity Sites.

> Our Corridor is NOT a public transit rich artery but rather increasingly functions as an alternate shortcut to freeway use not only for single vehicle commuters but also more recent large warehouse

commercial vehicles, and many of these vehicles originate from outside of our community and beyond our city to coalesce with local traffic into jams at our schools, serial traffic lights and our I-91 freeway exchange during day-long hours of commuting for work, business and school attendance.

> The Church on the Hill and 2201 Fairview Avenue proposed sites (potential 243 units) bracket the intersection of Fairview with Alessandro/Central at its most narrowed, concentrated section at the bottom of one of its most dangerous, curved downhill runs, notorious for frequent accidents and numerous fatalities. (We continue our repeated requests to the City for this data.) The sites are directly across from the Lutheran Elementary campus, less than one block from Alcott Elementary and its access and traffic light, and the next light down Central is for the main entrance to Poly High School, just before the main traffic intersection of Central and Victoria.

> The proposed site on Central adjacent to Olivewood Cemetery ( potential 200 units)is close to both the Cemetery stoplight and multiple freeway exchange stoplights just beyond, the source of chronic jams during commuting and school and business hours. This site would directly add to the jams and would be compromised by its one way access on and off central that would require a U-turn for access to and from the opposite direction.

> The development of these proposed sites would require the removal of two established places of worship and three established low density single residence homesites, replacing their minimal impact on commuting with that from high density housing.

> If these proposed Opportunity Sites and their zoning changes are passed, it will result in a by-right mandate for high density development with lessened discretionary oversight for community impacts in the future. There would be little chance for turning back that page.

The City has used established planning protocols in its Housing Element rewrite for suggesting the Opportunity Sites but in an almost purely formulaic and procedural process unable to consider the on-the-ground, site specific community impacts or concerns. They have clearly stated that this is for the Planning Commission and the City Council to address and is beyond their responsibility. For all of the site and community specific points listed above, we feel these site choices are ill advised and potentially harmful to our community, its health and safety and quality of life, and we oppose these choices and zoning changes. We solicit your firm representation on our behalf and look forward to sharing these concerns with the rest of Council Members and the Planning Commissioners for their serious consideration and hopeful support of our community.

Thank you and regards,

Enn



Ellie Uli  
5420 Glenhaven Ave.  
Riverside, Ca. 92506  
951/781-8105

RECEIVED

AUG 20 2021

City of Riverside  
City Clerk's Office  
ON 44 CONDO'S  
& MORE

City Clerk,  
Dear Councilmember

Re: NO

I'm sending a printed copy of an e-mail I attempted to send you on July 7, 2021, of which I recently learned, did not reach you. Therefore, I felt compelled to send my letter now, as the subject is extremely important to several hundred people who share my concerns & live in or very near to my address.

I attended a live city council meeting on July 6, 2021, and I spoke at that meeting regarding the NO ON 44 CONDOS issue.

In addition to the letter of July 7, 2021, I would like to add the following questions, of which I request answers from you or qualified persons who have the information:

Re: issue related to SB 10 & SB 9:

- Will we be notified or informed of modification to SB 9? SB 10, as you know, openly invites gentrification of older, diverse, multi-family and single-family areas. It requires NO affordable units. A copycat of Wiener's defeated SB 902, SB 10 is an anti-voter bill that also allows a City Council to override voter-approved land-protection initiatives, including boundaries & open space. an attack on our 108-year-old right to voter initiative.
- What communication about this mass zoning change was sent BY MAIL to every citizen or at least every homeowner?
- Does the Planning Committee believe they have done enough to communicate to every citizen about the massive zoning change?

(Please see pg. 2)



From: Ellie Uli, 8/14/2021

Page 2

Re: NO ON 44 CONDOS

- How many citizens watched Planning division videos and asked questions regarding Housing Element?
- Will the Planning division mail letters to notify property owners adjacent to the 1,000 Opportunity sites stating the City's plan to ALTER ZONING to allow for DENSE HOUSING/RETAIL?
- Was any member of the Planning division ACTUALLY VISITED IN PERSON the sites of the 1,000 lots to determine IF the property was genuinely FIT for DENSE HOUSING?
- Regarding the above referenced properties: were these properties chosen/selected from viewing a satellite map WITHOUT personal/actual/ON SITE VISITATION?
- I request that you/whomever is knowledgeable regarding these issues, explain in your/their own words, how adding 24,000 dwelling units will IMPACT AIR POLLUTION!
- How will traffic be impacted? Exhaust emissions? Air pollution? Use of additional water & electricity?
- Do these people involved believe green space is adequate? One can only WONDER when you look at the "green space" apartments currently being built on Merril St, near Trader Joe's and CVS AND AN ELEMENTARY SCHOOL? These buildings are packed in like sardine cans - HIDEOUS! This proposed massive zoning change & building of dense housing in THIS particular location is NOT SUITABLE in relation to the adjacent businesses. There's no way to protect shoppers & local school children from tenants who might be child molesters or drug users, etc.
- This whole proposal along with the NO ON 44 CONDOS is a mess & will permanently degrade Riverside, & we will never recover from it.

Respectfully, Ellie Uli

Fw: Subject: City of Riverside; Planned Victoria Woods  
Project Radically Changes Neighborhood AKA No on  
44 Condos

Yahoo/Sent



Ellie Uli <mizzellie@att.net>

To: Nancy Magi

Wed, Jul 7 at 8:04 PM

ATTN: City Clerk -

Subject: Subject: City of Riverside; Planned Victoria Woods Project Radically Changes  
Neighborhood AKA No on 44 Condos

Dear Honorable Mayor and Council Members:

I am writing to inform you of my concerns for the above noted project. First, please allow me to introduce myself to you

My name is Ellie Uli (pronounced You-lee). My husband (Jim Uli) bought our house at 5420 Glenhaven Ave. Riverside, CA, 92506 approximately 1975. I married him and moved into this house 5/23/1981, now just over 40 years ago. I have lived in Riverside since 1954 when my parents moved here from Washington state.

A little background info on myself:

I worked for the City of Riverside for 15 years, from 1994 to 2009. Nine of those 15 years was spent in the City Council's office where I assisted all seven councilmembers and from time-to-time, also supported phones for three City Managers, the Mayor and the City Clerk's offices. During that time, I upgraded the "receptionist" position for City Council and City Managers office by helping to lay the groundwork for what was then known as Council Relations Assistant, (or at least, that was the title when I left that position), and also during the time I working the the City Council's office I laid the groundwork for/and was 75% instrumental in developing and implementing the 3-1-1 Call Center. Later, my last position with the City, was to renovate and implement an efficient manner by which to process and issue the street closure Special Event permits, (i.e. neighborhood block parties, the Festival of Lights, the former Orange Blossom Festival, etc. Any time an event necessitated the closure of city streets to make the event safe.

Prior to working for the City, I had been a Dental Assistant for approximately 20 years, then owned/managed by own retail card & gift store here in town for 5 years. I worked at several different jobs over the years, one of which was as a 9-1-1 Emergency Dispatcher for the County of Riverside Sheriff's Dept. I also worked in mental health, in a "lock-down" crisis intervention facility in Corona, as executive secretary for the two M.D. Psychiatrists in charge of the adult and the adolescent programs; and later in private practice as office manager and business manager.

My education includes, graduation from Ramona High School), here in Riverside, and I received a B.A. Degree in Political Science from Cal Baptist University (here in Riverside), I also had studied to become a court reporter, therefore, I am well versed in English grammar, Dental, Medical and Legal terminology. Having worked for the City of Riverside, I feel I have a very good understanding regarding how all the different city departments function.

My family moved to Riverside, CA in 1954, I grew up, attended local schools. I graduated from Ramona High School 1965, and later achieved my BA Degree in Political Science from CBU.

Topic at Hand: NO on 44 Condos, and here is my opinion as to WHY this should not happen!!!

Please  
keep  
"on file"

This neighborhood cannot sustain 44 condos which will house anywhere from 2 - 6 persons (and possibly more) per unit. This means at least 88 more vehicles, (if not more), plus vehicles by their friends/relatives and babysitters, repair people, etc. who might come to visit on weekends/holidays or weekdays to provide services, etc.

#### ISSUES:

##### TRAFFIC

Glenhaven and Fairview have only been repaved once in the 40 years I've lived here, and it was over 20 years ago that Glenhaven was repaved, as per my own notations.

We get a tremendous amount of "through" traffic that comes as far away as Banning/Beaumont (and probably farther), that I personally have followed all those miles from those locations, into Riverside, past my house on Glenhaven, down Sedgwick, to 14th St., then down 14th St. to the 91 FWY ! Glenhaven Ave. is a "through" street and a "shortcut" from beyond Banning/Beaumont/Moreno Valley to the 91 Fwy at 14th St., Riverside.I

##### WATER PRESSURE:

I've lived at 5420 Glenhaven Ave. since May 23, 1981, and the water pressure for this area was very low THEN and has continued to be LOW even up to NOW! The City had slated to put in larger water pipes down Central Ave., to serve this and other neighborhoods along Central Ave, in 2005, it was slated, and then it was post-poned to 2010, and then it was forgotten.....except in 2017, the city did a LITTLE work on Arroyo Dr. (from Victoria Ave. to the bend in the road where Arroyo Dr. curves onto Glenhaven Ave. Then the new pavement stopped, as did the water pipe project.I

Another water concern: Over the past 2 - 3 years, the City's Streets and/or Water Department staff have had work crews and huge trucks, cutting open areas in front of my house, and the houses immediately to next to me and across the street from me SEARCHING for water leaks that they detect but don't seem to be able to find. I'm concerned about underground water leakage from these very old water pipes, and concerned that one day I might try to drive into or back out of my driveway and have my car fall into a huge sink hole!

##### ELECTRIC POWER:

The power grid for this neighborhood is over 60 - possibly even closer to 70 years old. We have power failures very often! It's been "overloaded" for nearly 50 years now, and the addition of 44 units to accommodate the number of people (mentioned above), is just not practical, in fact it's just insane.I

The City is WAY BEHIND in upgrading the electrical power service to this area now, it cannot and will not sustain additional housing units of ANY NUMBER! And, even if the city upgrades the power grid, we are still faced with several other pertinent issues.I

##### Safety:

There is one public school (Alcott), and one private school, (Immanuel Lutheran School), as well as a church in this neighborhood, and a lot of children live in this area. Alcott Elementary School is currently under mass construction to enlarge the capacity of that schools enrollment capabilities, which will also mean MORE TRAFFIC coming into this area. The more housing units that are allowed in this area brings more and more possibilities for crime and unsafe situations for our children and elderly. Also, the topic that the projected 44 condos might be zoned as "subsidized housing units" is just not practical. This is an older, established neighborhood, and there is no room for a RADICAL INFLUX of 44 condo units. and all the added problems stated above. If that property were to be used for anything, it would be MAYBE one or two large parcels for PRIVATE residences for one or two additional families AT THE MOST.I With houses designed to enhance and complement the existing style of housing.

GRANITE: Most of the houses already here were built on top of ground with mass amounts of granite boulders beneath the visible portion of the ground. In my own back yard, the builder had to BLAST the boulders away to build the swimming pool, and had to cut off one corner of the pool to avoid a HUGE boulder. When I re-landscaped my back yard, I found a lot of large ROCKS and another HUGE BOULDER which broke the tractor's scoop.

Anyone who would wants to build on that area in question, I would recommend they highly reconsider ANY type of building.....gee. maybe that's WHY no one else built on it before now ? HMM??? Granite, wonder how much damage some of our current properties might suffer if a contractor had to BLAST away huge granite boulders in order to build anything in that location.

I remember about 15 years ago, when condo units were built next to the former Riverside Swim Club (which is now defunct) and the added traffic we've had since then ! The added number of people to utilize our water and electric power sources, etc. (And NO, we don't want any more condos on that site, either !!!)

Respectfully, *E. Uli*

Ellie Uli, Resident/Home Owner/ Tax Payer

5420 Glenhaven Ave.  
Riverside, CA 92506

Phone: 951/781-8105 (FYI: this phone does not receive TEXT messages. Thank you).



**From:** Gregory Smith <gregorysmith1964@yahoo.com>

**Sent:** Saturday, August 28, 2021 9:52 AM

**To:** Andrade, Frances <FANDRADE@riversideca.gov>

**Cc:** Cervantes, Clarissa <ClCervantes@riversideca.gov>

**Subject:** [External] e-Comment for Agenda Item 2 PLANNING CASE PR-2021-001058 on 9/9/21

Hello City of Riverside Planning Commissioners - I am the President of The Crest HOA located at 5050 Canyon Crest Drive, next to APN 253-210-051 which is Site ID 120 of the Residential Sites Inventory in Ward 2. That 0.65 acre parcel is located next to us, and is on the corner of Canyon Crest Drive and El Cerrito Drive. The owners and residents of The Crest OPPOSE rezoning of that particular parcel of land to R-4, as we believe there is already way too much traffic and activity in our area. We understand there is not yet a specific development proposal for that parcel. There are already a large number lower income apartments on Canyon Crest Drive (on the other side of El Cerrito Dr), and we do not believe rezoning this parcel is good for our neighborhood, nor our city. Thank you. -Greg Smith, President, The Crest Homeowner's Association, cell: (951) 206-1499 email: [gregorysmith1964@yahoo.com](mailto:gregorysmith1964@yahoo.com)

**From:** Buysse, Jim <Jim.Buysse@rccd.edu>

**Sent:** Wednesday, September 1, 2021 10:57 PM

**To:** Andrade, Frances <FANDRADE@riversideca.gov>

**Cc:** Taylor, Matthew <MTaylor@riversideca.gov>

**Subject:** [External] Sept. 9 Planning Commission Meeting-Housing Element Plan

Dear Planning Commission Members,

Please see the attached paper I've written to express my concerns, and those of many others, relative to the Housing Element Plan. I thank you for your consideration of the concerns set forth therein.

Sincerely,

Jim Buysse

Resident, Ward 3

Vice Chancellor Emeritus, Administration and Finance  
Riverside Community College District

I'm Jim Buysse, a 30-year Riverside resident, and for 20 years of those years, I served as Vice Chancellor for Administration & Finance with the Riverside Community College District. I've been engaged in planning for half a century, beginning with my selection as a member of a four-person team which wrote the first postsecondary education master plan for the State of Colorado.

I understand and appreciate that City Council must consider the future development of our City. That makes your job as a Planning Commission exceedingly important. However, I believe this planning process is problematic in terms of its origin, how it's been done, and how the plan would be implemented.

The Housing Element plan was developed pursuant to a State mandate. Riverside was then given an "allocation" of units by SCAG. I seriously doubt that SCAG and our Planning Department can predict what the future will hold in terms of housing demand. Thus, this planning exercise is premised on specious assumptions.

Such planning must be decentralized to be effective. Various alternative futures should be assessed. Centralized planning never works, at least not in a positive way. Yet, the State proceeds with a "one size fits all" approach. But this State is very diverse. One size doesn't fit all, especially as regards local planning. We need a plan free from State and regional intervention, one that speaks to Riverside's particular characteristics. Cities in Orange County and elsewhere in the State are challenging this State mandate for this reason. Riverside should join them.

Second, the way the planning has been done, presumably pursuant to State dictates, is disconcerting. How is “fair housing” defined? What does “inclusion” mean? These words have become part of the common vernacular...albeit without common understanding of their meaning.

Is there evidence we are neither fair nor inclusive? And how was the notion of segregation derived? Apparently, City “segregation” patterns were analyzed. Who’s been engaging in segregation? City council? Again, where’s the evidence? And environmental justice? That term tortures the English language. Get rid of the gobbledygook.

Additionally, when it comes to analysis, we see percentages, such as the percentage of the population. For example, less than 25% of low and moderate housing is located in various areas of the City. So what? That tells us little. Is that better or worse than a decade ago? What are the trend lines? And what are the benchmarks against which percentages are compared? Is the low/moderate income group of the same demographic composition today as that of the past? Was any of this considered? How deep was the data dive?

Further, what would Housing Element Plan implementation look like? Seems like zoning would be changed. Would that occur before a property is sold? Would it require eminent domain? Would an owner losing property value sue for recompense? Would there be an appeal process for property owners?

Let’s get real on this. People are where they are, but not by accident. One could say they have skin in the game. They’ve worked and saved to buy a home, and then to buy a bigger home in more pleasant surroundings with better schools as their families grew. Americans have been doing that for decades. It’s called moving up and achieving the American dream.

These homeowners don’t want to be in neighborhoods where people do not have skin in the game, as in those situations, properties tend not to be as well maintained. Parking can be more problematic. And they tend not to be as safe. I could go on, but that is reality. We need to be clear-eyed in looking at housing issues. We need a plan that is flexible. Utopian thinking simply won’t work.

Also, how can low income housing work, when State and local governments add myriad regulations contributing to higher housing costs? The math doesn’t work if these regulations are not ameliorated in a way that does not burden taxpayers. Builders, after all, will not build houses at a loss.

In closing, please tell City Council the Housing Element plan must be revisited until these kinds of questions are addressed and the language made more intelligible. Tell Council its duty is to Riverside residents, not to the State and its distant bureaucracy, and not to a regional group either. Lastly, tell the City it should join other California cities in challenging the State mandate. Simply stated, it’s time to stand up for Riverside.

**From:** dgazzolo@aol.com <dgazzolo@aol.com>  
**Sent:** Wednesday, September 1, 2021 10:28 PM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] Housing Element

9/1/2021

Hello Planning Commissioners ,

Thank you for the opportunity to express our concerns with the Housing Element....This Housing Proposal appears to do more to satisfy the Politicians in Sacramento than it does to address the actual housing needs of Riverside residents..and future residents.

We were only recently made aware of this important issue and the lack of communication with the General Public is of great concern. We are asking for further *clarification* and the *removal* of some of the site included in this proposal .

Please Clarify :

Why does the Housing Element Designate 24000units (as a cushion ) when only 18458 units are required by the State.. WHY do we need a cushion of 5542 units if you **do not have to guarantee** building on them ?? It appears to be free zoning changes that will only benefit the developers.....not the surrounding community

*"RHNA is ultimately a requirement that the region zone sufficiently in order for these homes to have the potential to be built , but it is not a requirement or guarantee that these homes will be built" ...SO WHY THE EXTRA 5542 UNITS ??*

Why does the Housing Element require zoning changes to over 200 "opportunity sites" if these site **do not have to guarantee building**... The zoning change from R-1 to multi housing is significant and should assessed on a case-by-case basic...mass zoning changes circumvent the intense scrutiny typically given when site are considered for zoning changes *individually*. This is NOT *Sensible and Sound* City Planning !!!

Please consider the **Removal** the 6 "opportunity sites " on Central Ave. from the Housing Element !

By the City's own estimate,a total of 444dwelling units are proposed in the mile long corridor

(Central Ave.between Glenhaven and Olivewood Cemetery) which also includes 5 schools and 4 places of worship.

*This total figure is determined by reviewing the Housing Opportunity Site Information Tool and the RHNA Housing Element Opportunity Site Inventory.*

**Have you driven down Central Avenue lately ??**What traffic Study was conducted ? What Environmental Impact Study ? How will the traffic flow when "U" turns are not allowed at most intersections on Central Ave.

At what point were plans submitted to build the"44 condos" ?

And at what point was the "44 condo" property added to the Housing Element ?



It appears these 800+ sites were chosen using a formulaic and procedural process devoid of consideration for the detrimental impact to on-the-ground, site specific communities ....We are Riverside Residents and taxpayers ---Our public input and impact should be the primary concern !

Thank You,

Jay & Diana Gazzolo  
Riverside Ca.

-----Original Message-----

From: Sally Lauruhn <calpolysally@yahoo.com>

Sent: Wednesday, September 1, 2021 6:52 PM

To: Andrade, Frances <FANDRADE@riversideca.gov>

Cc: Taylor, Matthew <MTaylor@riversideca.gov>

Subject: [External] Community Sites/Dense Housing

As a 40 year resident of the Victoria Woods area, I am writing in opposition to any zone changes along Central Ave. from Chicago to the 91. We have enough traffic as it is. I used to walk up Central from Alcott to the former Swim Club but it has become too,too dangerous, with speeding cars, and noise and air pollution. It is not uncommon to have cars backed up in the mornings from Rumsey to the 91, and then it is reversed in the evenings. We have a traffic light at Alcott because a child was injured crossing that street many years ago. Adding more housing units along this street would only add to the situation of traffic. 41 Condos at Central and Fairview would be a disaster. Getting on to Central from Fairview is dependent on the traffic light east of it. Turning off Central on to Fairview, the drivers would need to go down to Glenhaven. and make a U turn at that intersection. Those folks down there will not put up with it. Parking along Fairview is a nightmare now, and watch out for street sweeping day and trash pick up days. We all juggle our cars on those days. In case of an emergency evacuation, Fairview would need to accommodate all the families that live down in the area all the way to Andulka Park. The Condos and/or any apartments do not belong in this neighborhood of single home dwellings! What would happen if we just said NO to this state mandate????? Thank you for your attention. Sincerely, Sally Lauruhn

**From:** Jim Zikratch <jzikratch@gmail.com>

**Sent:** Wednesday, September 1, 2021 1:38 PM

**To:** Andrade, Frances <FANDRADE@riversideca.gov>

**Subject:** [External] e-Comment for Agenda Item 2 PLANNING CASE PR-2021-001058 on 9/9/21

To whom it may concern:

I am writing as a resident homeowner who is part of The Crest Homeowners Association, located at 5050 Canyon Crest Drive.

Immediately behind my back yard is a vacant .65 acre parcel, which is located at the intersection of El Cerrito Drive and Canyon Crest Drive. This parcel is apparently APN 253-210-051 which is Site ID 120 of the Residential Sites Inventory in Ward 2.

I am writing to oppose the rezoning of this parcel to R-4 status because this area has already become extremely busy with traffic at all hours. A more appropriate use for this narrow strip of land would be for some type of park or green area, rather than for high density residential use. There are already plenty of low-cost apartments on Canyon Crest Drive just across El Cerrito Drive.

In summary, I feel that placing high-density housing on such a small tract of land would be detrimental to the neighborhood and to me personally.

Thank you for your consideration.

James Zikratch  
5050 Canyon Crest Drive, Unit 27  
Riverside, California 92507

**From:** [Paul Legan](#)  
**To:** [Taylor, Matthew](#)  
**Subject:** [External] Zoning  
**Date:** Thursday, September 2, 2021 4:26:47 PM

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I have been a Riverside resident for over 70 years and live in the Victoria Woods area. I am strongly against 44 condos and other dwelling units projected for Central Ave. There is already a traffic problem—what traffic studies were done??

There has been a total lack of communication with the public and the planning and selection of “opportunity sites”. Citizens should be given the chance to provide input into the selection. Zoning changes should be by individual sites.

This is NOT sensible and sound city planning.

MaryAnn Bridges

Sent from my iPhone

**From:** [Frank Byrne](#)  
**To:** [Taylor, Matthew](#)  
**Subject:** [External] Housing Element Update  
**Date:** Thursday, September 2, 2021 4:58:37 PM

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Dear Mr Taylor,

My name is Frank Byrne and I live in Ward 3 beside two of the proposed Opportunity Sites recommended for rezoning as part of the City's Housing Element update.

In the draft EIR, the Planning Division have evaluated several alternative scenarios to the proposed Project. Their conclusion was that all significant effects of the proposed project were reduced to less than significant with implementation of mitigation measures for impacts on:

- Biological resources
- Cultural resources
- Paleontological resources
- Hazards and hazardous materials
- Tribal cultural resources

I'm pleased that the deleterious effects of the Project on these resources can be mitigated. However, while these mitigation measures are important and should be implemented, I am extremely concerned about the inability of any mitigation measures to reduce impacts related to:

- Air quality
- Greenhouse gas emissions
- Noise
- Transportation
- Population
- Housing

These factors affect the health and well-being of the entire population of Riverside and beyond, and I think it is essential that additional efforts are made by the Planning Division to reduce their impacts to below significant levels.

Because of the inability of the mitigation measures to counteract those deleterious impacts, in order for the project to be approved, a Statement of Overriding Considerations is required to be adopted by the City Council. If that happens, the City is essentially telling the members of its community that they are less important than the City's need to have the current draft of the Housing Element update approved. Once approved, a massive rezoning will occur, including sites that are totally inappropriate for high density units. I am asking the Planning Commissioners and the Council Members to vote this proposed project down in order to protect the health of the citizens of Riverside, most of whom are unaware of the sweeping changes being proposed by The City with the rezoning of Opportunity Sites in their neighborhoods. According to the Planning Division, people within 300 feet of an Opportunity Site received notice of this meeting, which is a very small proportion of the total population of Riverside. I'm sure you understand that the impacts associated with the development of Opportunity Sites will go well beyond the 300-foot area around them. The Planning Division admitted as much in their EIR. Air quality, GGEs, noise – they don't recognize such arbitrary boundaries.

The Planning Division outlines various alternatives to their proposal in order to mitigate impacts. Rather than just complain, I would like to propose an additional alternative. The City's proposal accommodates potential housing at a 60% higher level than that required by RHNA. My alternative mitigation strategy is to reduce the number of Opportunity Sites, particularly high-density housing units in single-family residential areas. Such a strategy will immediately reduce the major impacts associated with the current proposal. Why would you not want to do that?

Thanks you,

Frank Byrne  
2307 Central Ave,  
Riverside,  
CA 92506  
951-323-0894



**From:** Michelle Carnley <realtormichellecarnley@gmail.com>  
**Sent:** Thursday, September 2, 2021 10:50 AM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] Housing element changes

Good Morning,

Michelle Carnley with Coldwell Banker. I am writing to oppose the number of housing units proposed, and the location? Who decided on Central Avenue? Why 24,000 units when only 18458 are needed/required? Why are you trying to make Riverside pay with taxes for more than we need? Who chose the location? Did anyone think of the traffic and congestion already on Central? Riverside City taxpayers oppose this. I am writing to voice my opposition on wasteful spending! Thank you. I will be in attendance at the City Hall meeting to verbalize concerns!

See you then,

--



MICHELLE CARNLEY CALDRE#01985202  
COLDWELL BANKER ASSOCIATED BROKERS REALTY  
(951) 237-0748



**From:** Bruce Jackson <[bjax000@yahoo.com](mailto:bjax000@yahoo.com)>

**Date:** September 2, 2021 at 6:25:45 PM PDT

**To:** [fandradee@riversideca.gov](mailto:fandradee@riversideca.gov)

**Cc:** [Mtaylor@riversideca.gov](mailto:Mtaylor@riversideca.gov)

**Subject:** September 9th Planning Commission Meeting-Housing Element Plan

Dear Planning Commission Members,

This communication is to voice my concerns regarding the potential Housing Element Plan under consideration.

The City of Riverside is blessed with many diverse and historic neighborhoods ranging in style from mid-century modern to Victorians. Some are in better condition than they were new. Even those in disrepair maintain value due to their potential for renovation. This is a positive cycle that sustains interest in our older communities.

This wonderful cycle would cease in Riverside with the enactment of the proposed zoning changes. Many neighborhoods through out the city would decline into overpopulated car lined streets where garages have been converted in dwelling units and back yards with apartments. Where do kids play? Where folks can't sit on their front porches and watch the world go by.....too many cars parked in front of their house. It is naive to think people will get rid of their cars and hop on one of the empty buses cruising around town for years.

This destruction of our way of life is just one of the short coming of this feeble plan.

Consider:

Water- we are in drought conditions on a regular basis. We live in a desert.

Sewers- old and very overtaxed...unless you live in the hills and you just flush it down the hill.

Electricity- there is not enough capacity now to keep all the Teslas running all the time.

Trash- how can it be picked up with all those darn cars parked on the street in front of your house

Jobs- obsolete.....big bother will just keep printing out those checks backed with our money....which will not be worth much.

All these issues have happened to communities that cram too many people into an area not sustainable at that level of occupancy. High density housing belongs near transportation and commercial activity. Please reconsider this draconian plan to devalue our home.....don't forget what flows down the hill.

Thank you for listening.

Bruce Jackson

Ward 2

Degree in Urban Planning

California State University-Pomona

**From:** Nancy Magi <troutquilt@sbcglobal.net>  
**Sent:** Thursday, September 2, 2021 8:40 AM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] Fwd: N Magi questions & comment on Housing Element

Good morning, Frances- will you please include this email in the Commissioners' packet for the September 9 meeting?  
Thank you.

The Planning Commission agenda states in its conclusion, "All effects of the proposed project have been reduced to less than significant with implementation of mitigation measures,

WITH THE EXCEPTION OF . . .

AIR QUALITY  
GREENHOUSE GAS EMISSIONS  
NOISE  
POLLUTION  
HOUSING  
TRANSPORTATION" (Caps mine)

THAT LIST OF MASSIVE NEGATIVE IMPACTS DESCRIBES A MAJOR ATTACK ON OUR QUALITY OF LIFE IN RIVERSIDE.

HOW CAN WE BUILD DENSE HOUSING AND IGNORE OUR

AIR QUALITY,  
OUR GREEN SPACES,  
OUR IMPACTED TRAFFIC AND  
LACK OF PARKING SPACES . . .

AND STILL MAINTAIN A QUALITY OF LIFE?

THE ANSWER- WE CANNOT.

Nancy Magi

Sent from my iPad

**Subject: N Magi questions & comment on Housing Element**

Good Morning, Mary

Here are my questions and an observation as I meet the deadline for comments on the Housing Element for Riverside:

2). What is the difference between the “Land Use Policy Map” and 5). “Zoning Map”?

3). Where do Central/Alessandro roads fit into the “Specific Map”?

4) A). Please define “streamline” IN DETAIL in the context of the Housing Element.

4). B). Specifically which State legislation will the City’s compliance achieve?

The agenda states in its conclusion, “All effects of the proposed project have been reduced to less than significant with implementation of mitigation measures,

WITH THE EXCEPTION OF . . .

AIR QUALITY  
GREENHOUSE GAS EMISSIONS  
NOISE  
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HOUSING  
TRANSPORTATION” (Caps mine)

THAT LIST OF MASSIVE NEGATIVE IMPACTS DESCRIBES A MAJOR ATTACK ON OUR QUALITY OF LIFE IN RIVERSIDE.

HOW CAN WE BUILD DENSE HOUSING AND IGNORE OUR

AIR QUALITY,  
OUR GREEN SPACES,  
OUR IMPACTED TRAFFIC AND  
LACK OF PARKING SPACES . . .

AND STILL MAINTAIN A QUALITY OF LIFE?

THE ANSWER- WE CANNOT.

Nancy Magi

Sent from my iPad

**From:** [Stephanie Peterson](#)  
**To:** [Taylor, Matthew](#)  
**Subject:** [External] Dwelling Units on Central Avenue  
**Date:** Thursday, September 2, 2021 9:27:38 AM

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Dear Matt

My boys attend Poly High School as a freshman and sophomore. Getting my boys to and from school is not easy. The roads are extremely congested along Victoria and Central every day. Many kids walk to school; we need to keep these streets safe for our students. Creating more traffic by adding dwelling units would make these streets more dangerous. There are 5 schools and 4 churches/places of worship that have students attending their campuses every day along Central Avenue. Our schools are overcrowded. I am appalled that the City is considering adding 444 units here. I do not support this idea and do not want to see it implemented.

Stephanie Peterson

Sent from my iPhone

**From:** Stacie Ritter <ritterstacie@gmail.com>

**Sent:** Thursday, September 2, 2021 4:42 PM

**To:** Andrade, Frances <FANDRADE@riversideca.gov>

**Subject:** [External] Riverside Housing and Public Safety Updates and Environmental Justice Policies | CEDD

Good afternoon Francis, I hope you are having a great day!

Would you please make copies and give to each planning commissioner or email them?

DEAR COMMISSIONERS:

As I drive through LA on my way to Dodger Stadium, I am reminded how MUCH we do not want to be another Los Angeles. The more "high density housing" you insert in our big little city, the more we become like LA, along with their problems.

I would also like to address a few items:

1) Lack of Communication with Riversidians, most of the public found out about the whole EIR/General Plan/44 condo issue and more by accident about 3 months ago.

2) To me, changing zones for over 200 "opportunity sites" by passing the more intense scrutiny given, is not a sensible, sound, and effective way of city planning.

3) I still do not understand, nor agree with designating 24,000 units "as a cushion" when only 18,458 units are required by the State. I consider we do not need a cushion of 5,542 units if the city does not have to guarantee building on them? Since RHNA is ultimately a requirement that the region zones sufficiently, in order for these homes to have the potential to be built, but, it is not a requirement or guarantee that these homes will be built, again, why the extra 5,542. Free zoning changes that will only benefit the developers and not the surrounding community is not something I am for.

4) Lack of planning for Water. I am under the presumption we have a 20% reserve emergency capacity. With additional housing, these reserves will be depleted. Purchasing water from Colorado River or Northern California are overdrawn and expensive. With our State Govt telling us year in and year out that we have a water shortage and a drought, this is fiscally irresponsible.

5) Lack of power. Again, with the State Govt telling us every year, we have to use our appliances at certain times of the day, power outages, flex times, etc. it makes zero logical sense that we have the infrastructure to have all these additional housing units. In this day and age where we are being told to "go electric" on everything, but yet, like I stated above, we have all these power outages and flex times, etc.... I would really like to know the logistics of how the city will handle all of these housing units and power.

6) I know Matthew Taylor has spent so much time on this plan, but it just seems that these 800+ sites were chosen using a formulaic and procedural process which is unable to consider the detrimental impact to on-the-ground, site-specific communities. I am a Riverside Resident and a tax payer and we need to have input and should be the primary concern.

7) On 8/13/21, Matthew Taylor, Senior Planner stated " *We have taken the approach of developing Policies that could/would be incorporated into each of the other Elements of the General Plan that*

*address Environmental Justice issues."* Who are "WE " and WHY are you incorporating Environmental Justice Policies into the General Plan if not required by state or local laws?

I respectfully submit my questions, thoughts, and concerns to you for consideration. Thank you.

--

Kindest Regards<><

**STACIE RITTER** | **NEXTHOME FREE**

REALTOR® | TRANSACTION COORDINATOR | BRE#02101375

CELL: 951.961.3637

**GoARMY** | BeatNAVY



**From:** Ellen Laney <laney.ellen@att.net>

**Sent:** Sunday, September 5, 2021 2:14 PM

**To:** Andrade, Frances <FANDRADE@riversideca.gov>

**Subject:** [External] e=Comment for Agenda Item 2 PLANNING CASE PR -2021-001058 ON 9/9/21

Sent from [Mail](#) for Windows

Hello,

I am an owner/resident of The Crest HOA, at 5050 Canyon Crest Drive, 92507, next to APN 253-210-051, Site ID 120 of the residential Sites Inventory in Ward 2. This parcel is located next to us on the corner of Canyon Crest Drive, and El Cerrito Drive. I want to OPPOSE the proposed rezoning of that particular parcel of land to R-4. There is far too much traffic and activity in our area already. It is my understanding there is not a specific development proposal of that parcel at this time. I do not believe rezoning this parcel for higher density housing would be good for our neighborhood, as there are already a large number of lower income apartments on Canyon Crest Drive between El Cerrito Drive and Central Ave.

Thank you,

Ellen Laney

The Crest HOA

**From:** Dan Posey <dan.posey@gmail.com>  
**Sent:** Tuesday, September 7, 2021 9:20 AM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] PLANNING CASE PR-2021-001058

This plan will destroy single family neighborhoods by injecting thousands of dwelling units into low density neighborhoods.

This will impose increased costs and service demands on the city of Riverside.  
Trash collection is currently not being collected as scheduled.

Traffic and associated accidents will also increase and impose additional demands on police services.  
The current 18 sworn officers on the RPD day shift will be overwhelmed.

I specially oppose opportunity site 208 in ward 3.  
This change from R1 to R3 will insert 44 condo units into an established single family neighborhood.

This is a VERY BAD PLAN!

Dan Posey  
2300 Daventry Rd  
Riverside



**From:** Mary Gabe <marytoucan@gmail.com>

**Sent:** Wednesday, September 8, 2021 12:33 PM

**To:** Taylor, Matthew <MTaylor@riversideca.gov>; Andrade, Frances <FANDRADE@riversideca.gov>

**Subject:** [External] Opportunity sites

I am very concerned about the City designating over 200 opportunity sites for development, comprising more than 24,000 units, when the state's requirement is only 18,458 units. It seems to me that the designation of so many extra sites will not benefit the community, but only the potential developers.

Particularly upsetting to me is the proposed development of 44 condos at Fairview and Central. The lack of adequate parking and the increased traffic at this dangerous intersection would be very detrimental to our single family neighborhood. I would not oppose a much smaller number of condos at this site.

Please reconsider these plans.

Thank you.

Mary Gabe

# Legacy Financial Group, LP

41663 Date Street, Suite 200, Murrieta, CA 92562

Phone 951-894-7117  
Fax 951-894-7106

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September 8, 2021

Attn: City of Riverside Planning Commission  
Re: 2201 Fairview Ave Riverside, CA  
Rezoning as an Opportunity Site

Dear Sirs,

I am in receipt of the Planning Commission agenda for September 9, 2021. One of the items on that agenda is the rezoning of properties throughout the city in order to aid the city in achieving its affordable housing requirements.

As owner of the property located at 2201 Fairview Avenue, which has been listed as one of the potential Opportunity Sites, I am in favor of the rezoning and applaud the efforts put forth by the city of Riverside to meet the demand to provide affordable housing to our citizens and also allow our senior population to age in place in lieu of relocating from the community in which they have contributed to politically, culturally, economically and socially.

Should you need any additional information please do not hesitate to contact me.

Sincerely,



George F. Mears  
President

P: (626) 381-9248  
F: (626) 389-5414  
E: [info@mitchtsailaw.com](mailto:info@mitchtsailaw.com)



139 South Hudson Avenue  
Suite 200  
Pasadena, California 91101

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**VIA E-MAIL**

September 7, 2021

Matthew Taylor  
Senior Planner  
City of Riverside  
3900 Main Street, 3rd Floor  
Riverside, CA 92522  
Em: [mtaylor@riversideca.gov](mailto:mtaylor@riversideca.gov)

RE: City of Riverside Housing and Public Safety Element Updates Draft  
Environmental Impact Report

Dear Matthew Taylor,

On behalf of the Southwest Regional Council of Carpenters (“**Commenter**” or “**Southwest Carpenters**”), my Office is submitting these comments on the City of Riverside’s (“**City**” or “**Lead Agency**”) Draft Environmental Impact Report (“**DEIR or EIR**”) (SCH No. 2021040089) for the Housing and Public Safety Element Updates (“**Draft HEU**” or “**Project**”).

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this

Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

The City should require the Applicant provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

. . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California’s workforce

can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.<sup>1</sup>

Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the “[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component” can result in air pollutant reductions.<sup>2</sup>

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to “promote local hiring . . . to help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions.”<sup>3</sup>

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City “[c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint labor-management training programs, . . .”<sup>4</sup> In addition, the City of Hayward requires all projects 30,000 square feet or larger to “utilize apprentices from state-approved, joint labor-management training programs.”<sup>5</sup>

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

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<sup>1</sup> California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>

<sup>2</sup> South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>

<sup>3</sup> City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* [https://www.hayward-ca.gov/sites/default/files/documents/General\\_Plan\\_FINAL.pdf](https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf).

<sup>4</sup> City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* <https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specif%20Plan.pdf>.

<sup>5</sup> City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.<sup>6</sup>

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.<sup>7</sup> Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

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<sup>6</sup> California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, available at <https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

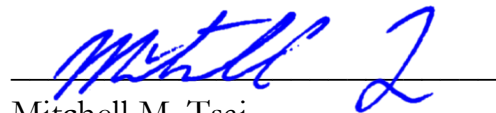
<sup>7</sup> Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, available at <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.

The City should also require the Project to be built to standards exceeding the current 2019 California Green Building Code to mitigate the Project's environmental impacts and to advance progress towards the State of California's environmental goals.

#### **IV. CONCLUSION**

Commenters request that the City consider the aforementioned issues raised. Please contact my Office if you have any questions or concerns.

Sincerely,



Mitchell M. Tsai  
Attorneys for Southwest Regional  
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).



## **EXHIBIT A**



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

2656 29<sup>th</sup> Street, Suite 201  
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.  
(949) 887-9013  
[mhagemann@swape.com](mailto:mhagemann@swape.com)

Paul E. Rosenfeld, PhD  
(310) 795-2335  
[prosenfeld@swape.com](mailto:prosenfeld@swape.com)

March 8, 2021

Mitchell M. Tsai  
155 South El Molino, Suite 104  
Pasadena, CA 91101

**Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling**

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Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

### Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."<sup>1</sup> CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.<sup>2</sup>

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.<sup>3</sup>

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<sup>1</sup> "California Emissions Estimator Model." CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

<sup>2</sup> "California Emissions Estimator Model." CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

<sup>3</sup> "CalEEMod User's Guide." CAPCOA, November 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/01\\_user-39-s-guide2016-3-2\\_15november2017.pdf?sfvrsn=4](http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4), p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled (“VMT”) associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.<sup>4</sup>

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

$$\text{“VMT}_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i) _n$$

Where:

$n$  = Number of land uses being modeled.”<sup>5</sup>

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

$$\text{“Emissions}_{\text{pollutant}} = \text{VMT} * \text{EF}_{\text{running,pollutant}}$$

Where:

$\text{Emissions}_{\text{pollutant}}$  = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

$\text{EF}_{\text{running,pollutant}}$  = emission factor for running emissions.”<sup>6</sup>

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

## Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.<sup>7</sup> In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act (“CEQA”) requires that such changes be justified by substantial evidence.<sup>8</sup> The default number of construction-related worker trips is calculated by multiplying the

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<sup>4</sup> “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/02\\_appendix-a2016-3-2.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 14-15.

<sup>5</sup> “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/02\\_appendix-a2016-3-2.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 23.

<sup>6</sup> “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/02\\_appendix-a2016-3-2.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 15.

<sup>7</sup> “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/01\\_user-39-s-guide2016-3-2\\_15november2017.pdf?sfvrsn=4](http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4), p. 34.

<sup>8</sup> CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.<sup>9</sup> Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively.”<sup>10</sup> Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.<sup>11</sup> The operational home-to-work vehicle trip lengths are:

“[B]ased on the location and urbanization selected on the project characteristic screen. These values were supplied by the air districts or use a default average for the state. Each district (or county) also assigns trip lengths for urban and rural settings” (emphasis added).<sup>12</sup>

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).<sup>13</sup>

<b>Worker Trip Length by Air Basin</b>		
<b>Air Basin</b>	<b>Rural (miles)</b>	<b>Urban (miles)</b>
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
<b>Average</b>	<b>16.47</b>	<b>11.17</b>
<b>Minimum</b>	<b>10.80</b>	<b>10.80</b>
<b>Maximum</b>	<b>19.80</b>	<b>14.70</b>
<b>Range</b>	<b>9.00</b>	<b>3.90</b>

<sup>9</sup> “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/01\\_user-39-s-guide2016-3-2\\_15november2017.pdf?sfvrsn=4](http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4), p. 34.

<sup>10</sup> “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/02\\_appendix-a2016-3-2.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 15.

<sup>11</sup> “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/02\\_appendix-a2016-3-2.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 14.

<sup>12</sup> “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/02\\_appendix-a2016-3-2.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6), p. 21.

<sup>13</sup> “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/05\\_appendix-d2016-3-2.pdf?sfvrsn=4](http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4), p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8- miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7- miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

### Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan (“Project”) located in the City of Claremont (“City”). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.<sup>14</sup> In an effort to evaluate the potential for a local hire provision to reduce the Project’s construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
<b>Without Local Hire Provision</b>	
Total Construction GHG Emissions (MT CO <sub>2</sub> e)	3,623
Amortized Construction GHG Emissions (MT CO <sub>2</sub> e/year)	120.77
<b>With Local Hire Provision</b>	
Total Construction GHG Emissions (MT CO <sub>2</sub> e)	3,024
Amortized Construction GHG Emissions (MT CO <sub>2</sub> e/year)	100.80
<b>% Decrease in Construction-related GHG Emissions</b>	<b>17%</b>

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project’s urbanization level and location.

<sup>14</sup> “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: [http://www.aqmd.gov/docs/default-source/caleemod/05\\_appendix-d2016-3-2.pdf?sfvrsn=4](http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4), p. D-85.

## Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

A handwritten signature in blue ink, appearing to read "M Hagemann".

Matt Hagemann, P.G., C.Hg.

A handwritten signature in blue ink, appearing to read "Paul Rosenfeld".

Paul E. Rosenfeld, Ph.D.

## **EXHIBIT B**



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## ***Paul Rosenfeld, Ph.D.***

*Principal Environmental Chemist*

**Chemical Fate and Transport & Air Dispersion Modeling**

**Risk Assessment & Remediation Specialist**

### **Education**

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

### **Professional Experience**

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.



## **Professional History:**

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner  
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)  
UCLA School of Public Health; 2003 to 2006; Adjunct Professor  
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator  
UCLA Institute of the Environment, 2001-2002; Research Associate  
Komex H<sub>2</sub>O Science, 2001 to 2003; Senior Remediation Scientist  
National Groundwater Association, 2002-2004; Lecturer  
San Diego State University, 1999-2001; Adjunct Professor  
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager  
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager  
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor  
King County, Seattle, 1996 – 1999; Scientist  
James River Corp., Washington, 1995-96; Scientist  
Big Creek Lumber, Davenport, California, 1995; Scientist  
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist  
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

## **Publications:**

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermid and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

**Rosenfeld, P.E.** & Feng, L. (2011). *The Risks of Hazardous Waste*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

**Rosenfeld, P.E.**, J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

**Rosenfeld, P. E.**, M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities*. Boston Massachusetts: Elsevier Publishing

**Rosenfeld, P.E.**, and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

**Rosenfeld P. E.**, J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

**Rosenfeld, P.E.**, and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

**Rosenfeld, P.E.**, and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49( 9), 171-178.

**Rosenfeld, P. E.**, Grey, M. A., Sellev, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

**Rosenfeld, P.E.**, Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS-6), Sacramento, CA Publication #442-02-008.

**Rosenfeld, P.E.**, and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

**Rosenfeld, P.E.**, and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

**Rosenfeld, P.E.**, C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

**Rosenfeld, P.E.**, and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

**Rosenfeld, P.E.**, and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld**. (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

**Rosenfeld, P. E.** (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

**Rosenfeld, P. E.** (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

**Rosenfeld, P. E.** (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

**Rosenfeld, P. E.** (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

**Rosenfeld, P. E.** (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

## **Presentations:**

**Rosenfeld, P.E.,** Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

**Rosenfeld, P.E.** (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

**Rosenfeld, P.E.** (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States” Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

**Rosenfeld, P. E.** (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water. Lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld P. E.** (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

**Rosenfeld P. E.** (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

**Paul Rosenfeld Ph.D.** (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

**Paul Rosenfeld Ph.D.** (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

**Paul Rosenfeld Ph.D.** (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

**Paul Rosenfeld Ph.D.** (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

**Paul Rosenfeld Ph.D.** (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

**Paul Rosenfeld Ph.D.** (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld Ph.D.** (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

**Paul Rosenfeld, Ph.D.** (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

**Paul Rosenfeld, Ph.D.** (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

**Rosenfeld, P. E.,** Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

**Paul Rosenfeld, Ph.D.** (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

**Paul Rosenfeld, Ph.D.** (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E.** and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

**Rosenfeld, P.E.** and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

**Rosenfeld. P.E.** (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

**Rosenfeld. P.E.** (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

**Rosenfeld, P.E.** (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E.,** C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.,** and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

**Rosenfeld, P.E.,** C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

**Rosenfeld, P.E.,** C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

**Rosenfeld, P.E.,** C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.,** C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

## **Teaching Experience:**

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

## **Academic Grants Awarded:**

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

## **Deposition and/or Trial Testimony:**

In the United States District Court For The District of New Jersey

Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.

Case No.: 2:17-cv-01624-ES-SCM

Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division

M/T Carla Maersk, *Plaintiffs*, vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido”  
*Defendant*.

Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237

Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica

Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants

Case No.: No. BC615636

Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica

The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants

Case No.: No. BC646857

Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado

Bells et al. Plaintiff vs. The 3M Company et al., Defendants

Case: No 1:16-cv-02531-RBJ

Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112<sup>th</sup> Judicial District

Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants

Cause No 1923

Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa

Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants

Cause No C12-01481

Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois

Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants

Case No.: No. 0i9-L-2295

Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles

Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC

Case No.: LC102019 (c/w BC582154)

Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division

Brenda J. Cooper, et al., *Plaintiffs*, vs. Meritor Inc., et al., *Defendants*

Case Number: 4:16-cv-52-DMB-JVM

Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish  
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants  
Case No.: No. 13-2-03987-5  
Rosenfeld Deposition, February 2017  
Trial, March 2017

In The Superior Court of the State of California, County of Alameda  
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants  
Case No.: RG14711115  
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County  
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants  
Case No.: LALA002187  
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County  
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants  
Law No.: LALA105144 - Division A  
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County  
Doug Pauls, et al., et al., Plaintiffs vs. Richard Warren, et al., Defendants  
Law No.: LALA105144 - Division A  
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia  
Robert Andrews, et al. v. Antero, et al.  
Civil Action NO. 14-C-30000  
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico  
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward  
DeRuyter, Defendants  
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County  
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant  
Case No 4980  
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17<sup>th</sup> Judicial Circuit, in and For Broward County, Florida  
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.  
Case Number CACE07030358 (26)  
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma  
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City  
Landfill, et al. Defendants.  
Case No. 5:12-cv-01152-C  
Rosenfeld Deposition: July 2014



In the County Court of Dallas County Texas

Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant*.

Case Number cc-11-01650-E

Rosenfeld Deposition: March and September 2013

Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio

John Michael Abicht, et al., *Plaintiffs*, vs. Republic Services, Inc., et al., *Defendants*

Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)

Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division

Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs*, vs. BP Products North America, Inc., *Defendant*.

Case 3:10-cv-00622

Rosenfeld Deposition: February 2012

Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland

Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants

Case Number: 03-C-12-012487 OT

Rosenfeld Deposition: September 2013

## **EXHIBIT C**



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

1640 5<sup>th</sup> St., Suite 204 Santa  
Santa Monica, California 90401  
Tel: (949) 887-9013  
Email: [mhagemann@swape.com](mailto:mhagemann@swape.com)

**Matthew F. Hagemann, P.G., C.Hg., QSD, QSP**

**Geologic and Hydrogeologic Characterization  
Industrial Stormwater Compliance  
Investigation and Remediation Strategies  
Litigation Support and Testifying Expert  
CEQA Review**

**Education:**

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.

B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

**Professional Certifications:**

California Professional Geologist

California Certified Hydrogeologist

Qualified SWPPP Developer and Practitioner

**Professional Experience:**

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

### **Executive Director:**

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

### **Hydrogeology:**

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

### **Policy:**

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

### **Geology:**

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

### **Teaching:**

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

### **Invited Testimony, Reports, Papers and Presentations:**

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

**Hagemann, M.F.**, 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

**Hagemann, M.F.**, 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.



Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

**Hagemann, M.F.**, 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

**Hagemann, M.F.**, 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

**Hagemann, M.F.**, 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

**Hagemann, M.F.**, 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

**Hagemann, M.F.**, 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

**Hagemann, M.F.**, 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

**Hagemann, M.F.**, and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F.**, 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F.**, 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**Hagemann, M.F.**, and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

**Hagemann, M.F.**, Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

**Hagemann, M. F.**, Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

**Hagemann, M.F.**, 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.F.** and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F.**, 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

**Hagemann, M.F.**, 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

**Other Experience:**

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

**From:** Jessica Aparicio <jessica@sigmabetaxi.com>  
**Sent:** Thursday, September 9, 2021 2:53 PM  
**To:** Andrade, Frances <FANDRADE@riversideca.gov>  
**Subject:** [External] Public Comment - Riverside Planning Commission Meeting - Agenda Item #2

Dear Riverside Planning HOusing Commission:

I am addressing Agenda Item #2 Riverside Housing Element. My name is Jessica Aparicio, and I am an advocacy director with SBX Youth & Family Services in Riverside County. Your responsibility to our community members and youth and I am here for accountability.

First of all, thank you for removing the Crime Free Multi-Housing Program from the 2021 - 2029 Housing Element. However, it is not clear if the program is ending or just removed from the Housing Element. The program is a barrier to housing for many system-impacted members of the community. We must ensure that we are taking into consideration all community members regardless of background.

Transportation is another barrier to our low-income communities and system-impacted members. I urge you to look for funding to go to RTA for as many lines as possible at 15 minute service or better. Additional stops would be the secondary ask. Creating more frequent service not only provides more convenience to our community members but can open for more RHNA zoning throughout the city.

Lastly, I would like to ask, how are we creating policies to mitigate the history of racism in redlining that has caused economic and social harm to the people of color in the City of Riverside?

Thank you.

Respectfully,

--

**Jessica Aparicio** | Director Of External Affairs  
**SBX Youth and Family Services**  
[jessica@sigmabetaxi.com](mailto:jessica@sigmabetaxi.com) | [sigmabetaxi.com](http://sigmabetaxi.com)  
14340 Elsworth Street, Suite 104, Moreno Valley, CA

**From:** Maribel Nunez <maribel@inlandequitypartnership.org>

**Sent:** Thursday, September 9, 2021 3:39 PM

**To:** Andrade, Frances <FANDRADE@riversideca.gov>; andrewp.villalobos@gmail.com; jim@ibew440.org

**Subject:** [External] public comment: Agenda #2 Riverside city planning commission 9/9/21

Dear Riverside City Planning Commission:

My name is Maribel Nunez. I'm a Riverside City Ward 1 resident. I am here to speak about Agenda Item #2 Riverside Housing Element

Thank you's: City Staff and City Council and Commission

- Thank you for initiating the 6th cycle in January, earlier in comparison to other cities starting dates and earlier when you did the 5th cycle housing element.
- Thank you city staff for taking our feedback and ideas of an interactive map and having in person meetings in addition to virtual meetings.
- Thank you city staff for having 1:1 meetings, and city council and the Mayor meeting as well with our coalition.
- We look forward after the housing element process is over, we will engage with the city in providing input for the next phase of work both Riverside city's general plan and inclusionary zoning program.

Thank you for removing the Crime Free Multi-Housing Program from the 2021 - 2029 Housing Element. However, it is not clear if the program is ending or just removed from the Housing Element. The program is a barrier to housing for many system-impacted members of the community. As we don't know Riverside's Opportunity Sites RHNA (Area Median Income) break down, we still want to thank city staff for having the opportunity sites be zoned for 30 dwelling units per acre, which will be available for affordable/lower income housing development projects. In comparing the 5th Cycle to 6th Cycle RHNA, appreciate adding new Riverside neighborhood areas into the 6th cycle like Canyon Crest area and Northside into new RHNA zoning sites.

Policy Recommendations:

1) AB 101 requires cities to allow a Low Barrier Navigation Center as a use by right in areas zoned for mixed uses and nonresidential zones that permit multifamily uses if they meet specified requirements. When will the zoning code be changed to meet this requirement?

2) Explore legislation that would provide zoning flexibility like SB 330 "Housing Crisis Act" to address limitations in broad swaths of Ward 4 - if so, consider reviewing Prop R and Measure C - are these truly being used agriculturally or protecting wealthy communities by protecting the practice of through exclusionary zoning.

3) Need to move past density being equated to affordable housing. This is using the state's density descriptor of affordability. When projects are being considered, Density bonuses are used for incentives. In seeing higher density housing projects, will not always translate as a marker for affordability. After the opportunity sites zoning, the city creates policies and selects

priority projects that lead to permanent affordability housing like co ops, community land trust.

4) Look for funding (including from city budget) to go to RTA for as many lines as possible at 15 minute service or better. Additional stops would be the secondary ask. The goal is to create frequent service on more transportation corridors throughout the city that can open for more RHNA zoning throughout the city (including Ward 4)

5) Eliminate single family zoning, we are running out of space as our population grows!

Best,  
Maribel Nunez,  
Ward 1 Riverside Resident  
Inland Equity Partnership  
(562) 569-4051

From: Christian Shaughnessy <christian@sigmabetaxi.com>

Sent: Thursday, September 9, 2021 2:13 PM

To: Andrade, Frances <FANDRADE@riversideca.gov>

Subject: [External] Public comment regarding Agenda Item #2 Riverside Housing Element

Good afternoon:

My name is Christian Shaughnessy and I urge the commission to do the following actions to show solidarity with the most vulnerable members of our community.

1. Strengthen the rent control ordinances above and beyond the Costa-Hawkins rules. The skyrocketing cost of rent is one of the major reasons why there is increasing homelessness.

2. Increase support for community wealth, that is to say permanent affordable housing options. This means assisting co-ops, community land trusts, and condos. This demonstrates a commitment to a long term approach to helping the people instead of a short term one.

Thank you very much and have a pleasant day.

Christian Shaughnessy

September 9, 2021

**Via First Class Mail**

City of Riverside  
Planning Commission  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522

*Re: Objection to Proposed Change in Housing Element for property located at 8527 Janet Street, City of Riverside (Site Number 87, APN 151111034)*

Dear Honorable Chair and Members of the Planning Commission,

This letter is being written on behalf of Shree Properties, Inc. to object to the City of Riverside Planning Commission's proposed discriminatory down-zoning of my client's property located at 8527 Janet Street, City of Riverside (Site Number 87 APN 151111034) ("Property"). As the City knows, Shree Properties, Inc. is slated to be a much-needed senior housing project, and is well into the planning stages, with design and engineering nearly complete ("Project"). In particular, as we understand, the Planning Commission is seeking to down-zone the Property from R-3-1500, to R-3-2500 which will result in lowering the density from 29 dwelling units per acre to 17.4 dwelling units per acre. This diminution in density will in fact cause great harm to the community, stripping it of much-needed housing, and will halt the Project in its entirety, causing great monetary damage to my client. Most importantly, any such down-zoning is prohibited by law. We therefore ask that the Planning Commission simply maintain the status quo, and keep the zoning and density as is – at R-3-1500.

**Background on the Project**

The Property is currently slated for a beautiful and much-needed senior housing facility, consisting of approximately 100 senior housing units with several amenities, meeting all current local law and development standards. The intent of this Project is to alleviate the housing crisis faced by the State of California, in particular for a growing and vulnerable population such as senior citizens. Further, the Project meets all development and architectural features, harmonizing with the local, as-built community. To date, my client has expended significant revenues and relied upon existing ordinances, standards, and regulations to hire contractors, architects, and other experts to begin planning, engineering and entitlement work. Any down-zoning in density to the Property will cause the Project not to be built, depriving the community of senior housing.



## **1. Down-zoning of the Project is Prohibited under the Housing Crisis Act of 2019**

Effective January 1, 2020, the Housing Crisis Act of 2019 (Gov. Code §§ 66300–65301) prohibits affected cities and counties from 1) changing the land use or zoning to a less intensive use, 2) imposing a moratorium on housing development, including mixed-use development, 3) imposing design standards that are not objective, and 4) implementing caps on housing approvals. (Gov. Code § 66300(b).) On the issue of “down-zoning,” the Housing Crisis Act prohibits “[c]hanging the general plan land use designation, specific plan land use designation, or zoning of a parcel or parcels of property to a less intensive use or reducing the intensity of land use within an existing general plan land use designation, specific plan land use designation, or zoning district below what was allowed under the land use designation and zoning ordinances of the affected county or affected city, as applicable, as in effect on January 1, 2018.” (Gov. Code § 66300(b)(1)(A).)

Here, the proposed changes in the housing element specifically down-zones the Property from 29 residential units per acre to 17.4 units per acre. This forty percent reduction in intensity and density is inexplicable, but more importantly, prohibited by the Housing Crisis Act of 2019. State law does not allow “anything that would lessen the intensity of housing.” Reducing the number of residential units by nearly half does exactly what State law prohibits—lessen the intensity of housing.

As stated, the Project is already in the entitlement phase, in reliance upon current zoning and density standards. Down-zoning the Project after a preliminary application has been submitted and acted upon by my client is unlawful and in contravention to State law. Because the Planning Commission has not yet approved the housing element, we urge commissioners to reconsider the proposed changes to the housing element to prevent the unlawful down-zoning of the Project.

## **2. Spot Zoning the Project is Unlawful**

It does not go unnoticed that this Property is in fact the only site being down-zoned in the entire City, which consists of 208 sites, violative of “spot zoning” laws. Staff has not provided any findings whatsoever for the proposed down-zoning of the Property, and has instead arbitrarily singled out the Property for lesser density than all of the Property’s surrounding parcels. In other words, the Property is surrounded by other properties zoned R-3-1500, without any reason whatsoever.

“The essence of spot zoning is irrational discrimination.” (*Foothill Communities Coalition v. County of Orange* (2014), 222 Cal. App. 4th 1302, 1311) (internal citations omitted). “Spot zoning occurs where a small parcel is restricted and given lesser rights than the surrounding property, as

where a lot in the center of a business or commercial district is limited to uses for residential purposes thereby creating an 'island' in the middle of a larger area devoted to other uses." (*Id.*) (internal citations and quotation marks omitted). Spot zoning which is "arbitrary or capricious or totally lacking in evidentiary support" is unlawful. (*Avenida San Juan Partnership v. City of San Clemente* (2011), 201 Cal. App. 4th 1256, 1268).

Here, the City does not have a rational basis for down-zoning the Project site while leaving all other parcels within the City unchanged. If enacted, the Housing Element update would create an island wherein the Project site would have significantly less housing use than neighboring parcels. This constitutes arbitrary and capricious spot zoning that discriminates against my client. Moreover, the spot zoning would create a detrimental affect against senior citizens who are in need of housing. The Project would fulfill a need for an aging and vulnerable population, while also advancing the State of California's goals to promote housing.

### **3 Planning Commission Staff Report Errors**

The current Planning Commission staff report and record contain numerous errors, misguiding the decision making of the commissioners. These errors are detrimental to the Project.

First, the Property is listed as a residential up-zone. This is incorrect. The Property is being down-zoned from 29 units per acre to 17.4 units per acre. Second, the Property is listed as not being in the 5<sup>th</sup> Cycle. Again, this is blatantly incorrect. The Property is in fact included in the 5<sup>th</sup> Cycle. As a matter of fact, we urge the Planning Commission to exclude this Property from the 6<sup>th</sup> Cycle, considering the 5<sup>th</sup> Cycle requirements should remain status quo for the Property. These errors are repeated throughout the record before the Planning Commission and must be corrected.

In conclusion, we urge the Planning Commission to keep the zoning for the Property and Project site unchanged. Doing so would promote the public interest, protect the rights of senior citizens, and protect the property rights of my client.

Very truly yours,



Jennifer A. Mizrahi, of  
STREAM KIM HICKS

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September 15, 2021

Matthew Taylor  
Planning Division  
3900 Main Street, 3rd Floor  
Riverside, CA 92522

RE: City of Riverside Draft Housing Element - Revisions

Dear Mr. Taylor,

On June 17, 2021, Inland Counties Legal Services provided comments on behalf of our clients related to the City of Riverside's draft General Plan Housing Element ("Draft") for the Sixth Cycle (2021-2029). On July 9, 2021, HCD provided the City with a comment letter outlining the necessary revisions the City must make to the Draft to bring in into compliance with State Housing Element Law. We have reviewed the City's revisions and have determined that the Draft still contains multiple deficiencies and does not comply with Housing Element law. For ease of reference, we will refer to the language from the Appendix to HCD's comment letter and followed by an evaluation of the identified changes; we will also be referring to the City's Comment Response Matrix, as provided to ICLS on September 9, 2021.

### **A. Review and Revision**

1. *As part of the evaluation of programs in the past cycle, the element must provide an explanation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers and persons experiencing homelessness).*
  - a. To date, the City has not completed this explanation for their past cycle program evaluation. The City's Matrix states "see TBR 4 – Review of Past Performance"; this section is essentially the same as in the previous Draft, which also did not include any explanations as required.

### **B. Housing Needs, Resources, and Constraints**

2. *Nonvacant Analysis: While the element identifies nonvacant sites to accommodate the regional housing need for lower-income households, it must support analysis factors with development trends and past experience and relate to the inventory...In addition, if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, the housing element must demonstrate that the existing use is not an impediment to additional residential development in the planning period (Gov. Code, § 65583.2, subd. (g)(2)).*
  - a. The Matrix states “See TBR-3 - Housing Resources - Methodology in Identifying Sites and Appendix B - Development Case Studies”, but it does not appear that the City has completed either of these analyses in those sections.
3. *Emergency Shelters: The analysis of adequate zoning for emergency shelters must discuss the characteristics of suitability of the zone(s) including environmental hazards and development standards including parking requirements. If the element cannot demonstrate compliance with the statutory requirements, a program to amend the zoning ordinance to meet the statutory requirements must be completed within one year of the adoption of the housing element.*
  - a. The City’s analysis has not changed from the previous housing element draft. “TBR-2 – Housing Constraints – Facilities for Persons Experiencing Homelessness”, which the City’s Matrix identifies as addressing the above required change, does not include any discussion of the characteristics of the suitability of the zones that permit emergency shelters, including environmental hazards and parking requirements.

### **C. Housing Programs**

4. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the*

*administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

- a. The City has not created this schedule of actions or included definitive implementation timelines; their housing programs are almost entirely similar to the previous Draft. The Matrix does not address this beyond “Updated page 6 of HE to include new Action Plan heading 3 - previously text was included under Housing Plan heading and might have lead (sic) to the confusion”.
5. *Programs HE-1.10 (Monitor Funding Sources), HE-3.4 (Water Sewer Priority), HE-6.3 (Residential Sites Inventory) should be revised to provide discrete timing to account for how often the action will occur as well as to ensure a beneficial impact throughout the planning period.*
  - a. The City has not made the required changes for Programs HE-3.4 and HE-6.3.
6. *The element indicates that several sites will require rezoning and that rezoning is expected to occur prior to the start of the planning period (October 15, 2021). Please be aware, if rezonings are not completed by the date, the element must include a program(s) to identify sites with appropriate zoning to accommodate the regional housing need within the planning period. (Gov. Code, § 65583.2, subd. (h) and (i).) The program(s) must commit to: permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households; accommodate a minimum of 16 units per site; require a minimum density of 20 units per acre; and at least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low and low-income housing need, if those sites: allow 100 percent residential use, and require residential use occupy 50 percent of the total floor area of a mixed-use project.*

- a. The City has committed to accommodating a minimum of 16 units per site and has a Rezoning Program listed on Pg. 131 of the Technical Background Report (per the Matrix).  
However, the City has not committed to adopting a program to permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households, requiring a minimum density of 20 units per acre, or accommodating at least 50 percent of the lower-income need on sites designated for rental use only or on sites zoned for mixed uses that accommodate all of the very low and low-income housing need if those sites meet the above requirements.
7. *Employee Housing Act: While program HE-3.7 was added to the element to comply with the Employee Housing Act, the program should be more specific and reference Health and Safety Code sections 17021.5 and 17021.6.*
  - a. The City has completed the second part of this recommended change in their revisions, but has not made the program more specific or given any indication that this program can be feasibly enacted. The Technical Background Report makes no mention of this program beyond the existence of the Employee Housing Act and this program's existence to comply with that Act.
8. *While the element includes Program HE-1-11 to address extremely low income which commits to working with developers to identify funding for housing affordable to extremely low -income households, it does not provide specific actions the city will take to assist in the development of housing for ELI households. In addition, the element must include programs to address the housing needs of special needs populations including seniors, large households, farmworkers, female headed households, homeless, and persons with disabilities including developmental disabilities. Program actions could include prioritizing some funding for housing developments affordable to ELI households and special needs population and offering financial incentives or regulatory concessions to encourage the development of housing types, such as multifamily, single-room occupancy (SRO) units, permanent supportive housing to address the identified housing needs for ELI households.*

- a. The City indicated that the program had been revised “with Housing Authority input”, per the Matrix. The following was added from the original Program HE-1-11 (in bold): “The City will continue to work with developers to **meet the City’s goal of building 500 units of ELI housing by 2027**, identify funding sources, and allocate funds appropriately to support ELI housing projects.” However, there are no identified programs to address the housing needs of special needs populations.
9. *As mentioned in Finding B1, programs throughout the element should be revised to address enhancing housing mobility strategies; encouraging development of new affordable housing in high resource areas; improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing; and protecting existing residents from displacement.*
  - a. The City has discussed displacement issues in the Technical Background Report (TBR), but otherwise has not completed the above recommended changes. The Matrix makes no mention of this section.
10. *The element identifies 701 units at-risk of converting to market-rate units in the planning period. Therefore, the element must include a program(s) with specific and proactive actions to preserve the at-risk units. For example, the program could support applications by nonprofits for funding to purchase at-risk units, work with owners to ensure tenants receive proper notifications, strengthen relationships with the listed nonprofits and develop a plan or strategy for quickly moving forward in the case units are noticed to convert to market-rate uses in the planning period, and consider pursuing funding on at least an annual basis. The program could also commit to contacting non-profits immediately to develop a preservation strategy by a date certain and be ready to quickly act when notice of conversion is received and monitoring the units to ensure tenants receive proper notifications.*
  - a. The City has identified Program HE-1-10 as this program in its Matrix, but the program does not contain either specific or proactive actions to preserve the at-risk units, instead stating that “expansion of this program will allow the City to

better understand the possible issues and determine ways to mitigate the risks”. CA Government Code § 65583(c)(6) states that “the program for preservation of assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs...”; the City has not done so, despite new resources available to the City, including money earmarked by the federal government for COVID-19 relief through the CARES Act of 2020 and American Rescue Plan of 2021.

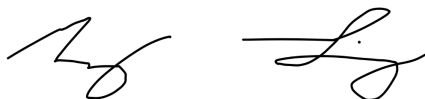
#### **D. Quantified Objectives**

11. *Include quantified objectives estimating the number of housing units by income category that can be constructed, rehabilitated, and conserved over a five-year time period.*
  - a. The City has stated that this will be included in the version submitted for certification, which does not allow the public the opportunity to review these objectives prior to HCD final review.

#### **CONCLUSION**

Riverside’s Draft Housing Element has still not come into compliance with the requirements of Housing Element Law, and we urge the City to make these required changes before adopting the Housing Element. If you have any questions or would like to discuss our comments, please contact Anthony Kim at 951-248-4725 or [akim@icls.org](mailto:akim@icls.org).

Sincerely,



Anthony Kim, Staff Attorney  
INLAND COUNTIES LEGAL SERVICES

CC: Gianna Marasovich, HCD; Robin Huntley, HCD





City of Arts & Innovation

**Public Comment for March 18, 2021**

**Planning Commission Meeting**

**Prepared by the Planning Division at 8:30 a.m. on March 18, 2021**

Item	Name	Neighborhood	Position	Comments
<p>4. PLANNING CASE PR-2020-00067 (CUP, VR, VR): Proposal by David Goodwin of Goodwin's Organic Food &amp; Drinks to consider the following entitlements: 1) Conditional Use Permit to permit the off-sale of alcoholic beverages (Type 20 - Off-Sale of Beer and Wine); 2) Variance to allow for the off-sale of alcohol within 600 feet of an assemblies of people non-entertainment and a public park (Islander Park); and 3) Variance to allow for the off-sale of alcohol within 1,000 feet of a business licensed by the State of California for the off-sale general alcoholic beverage sales with less than 15,000 square feet of gross floor area. The site consists of 0.91 acres and is developed with an existing market (Goodwin's Organic Food &amp; Drinks), located at 191 Big Springs Road, situated on the north side of Big Springs Road between Watkins Drive and Mt. Vernon Avenue, in the CR-NC - Commercial Retail and Neighborhood Commercial Overlay Zones, in Ward 2. The Community and Economic Development Department recommends that the City Planning Commission determine that this project is exempt from the California Environmental Quality Act pursuant to Section 15301 (Existing Facilities), as this project will not have a significant effect on the environment. Contact Planner: Candice Assadzadeh, Senior Planner, 951-826 5667, cassadzadeh@riversideca.gov</p>	Kevin Dawson	University	Oppose	<p>I am concerned and object to approving new liquor sales at Goodwin's. We already have University Village Market and Liquor right next door to Goodwin, and it is already a problem.</p> <p>Every time we do trash pickup along Watkins, we find empty liquor bottles. I have personally observe customers, on a regular basis, buying single serving alcohol in paper bags, and then either consuming it in the parking lot, or driving off, looking like they would be consuming it while driving.</p> <p>This is not just beer/wine, but hard liquor. I toured the store today. They wall to the west as you walk in is solid hard liquor, with a large stock of small single serving hard liquor bottles. The refrigerated cases are about 2/3 liquor is various types. Over all, the stock is about 2/3 volume liquor. If we looked at dollar value, it's probably 90% liquor and 10% grocery.</p> <p>Our neighborhood is residential. There is a church on the other side of Goodwin, two UCR Child Development (day care) schools north on Watkins and RUSD has their STEM academy south off Watkins and Mt. Vernon.</p> <p>We have had numerous car accidents along Watkins, involving drivers veering off the road and into residents homes.</p> <p>I would like a review of University Village Market &amp; Liquor, for any CUP or Variance with which they were granted as condition of their operation. I believe they were suppose to be mainly a market, but are now a full on liquor store. The signage around the building features liquor. The monument sign on the corner, had said University Liquor until a few years ago, when I had made an inquiry to the city about this same issue. Within a few weeks, the sign was changed to University Market. The signs in the parking lot, still say Parking for University Liquor.</p>
<p>5. HOUSING ELEMENT WORKSHOP - A workshop to update and inform the City Planning Commission about the Phase I General Plan Update - Housing Element, Public Safety Element and Environmental Justice Policies project</p>	Alan Taxpayer		Neutral	<p>Define environmental justice and what that has to with public safety</p>

Item	Name	Neighborhood	Position	Comments
5. HOUSING ELEMENT WORKSHOP - A workshop to update and inform the City Planning Commission about the Phase I General Plan Update - Housing Element, Public Safety Element and Environmental Justice Policies project	Allen Partono			<p>Dear Riverside City Council,</p> <p>Hello, I hope you are doing well! My name is Allen, and I wanted to list several recommendations with regards to the Housing Element that should be considered to make housing equitable to all residents in Riverside. They are:</p> <p>Stop Redlining  Have 15-minute bus service on all major arterials  Alessandro, van buren, Trautwein, Arlington, La Sierra, 3rd, MLK/14th, Iowa Avenue, Central Avenue, etc  We want increase the # RHNA on Ward 4  What is the affordable housing RHNA breakdown of the various Ward?  Intergenerational housing  Don't count the ADUs towards the RHNA numbers and add that to ward 4  There is commercial and transportation around Van Buren/Washington that could be a good viable location for R-3 zoning as well. It is in Ward 4  In Ward 4, around Martin Luther King it's a commercial spot (jobs and near schools) as well that could be a good place to add housing  In Ward 4, Victoria and Washington it's a site not identified that can be zoned for housing  In Ward 4, a lot of land is zoned as agricultural but where is the farmworkers housing? The Riverside General Plan stated, in 2017, "The Municipal Code has established the Residential Agricultural Zone (RA-5) to provide areas where general agricultural uses can occur independently or in conjunction with a single-family residence. Given the few remaining agricultural jobs in the community, the need for housing for farmworkers in Riverside is very limited. Moreover, should a need exist, the housing need would be limited to year-round affordable housing rather than dormitory housing typically required for migrant farmworkers." (General Plan H t r - 4 7) As there is still a large lack of affordable housing and no farmworker housing, would it be possible to make some space available for people to live there?</p>
5. HOUSING ELEMENT WORKSHOP - A workshop to update and inform the City Planning Commission about the Phase I General Plan Update - Housing Element, Public Safety Element and Environmental Justice Policies project	Kyle Sweeney		Neutral	Any development must plan for the future of our city. It needs to be insulated from the speculation that drives up prices and homelessness. It must be shielded from the gentrification that destroys communities.
5. HOUSING ELEMENT WORKSHOP - A workshop to update and inform the City Planning Commission about the Phase I General Plan Update - Housing Element, Public Safety Element and Environmental Justice Policies project	Lynn Heatley		Neutral	<p>I just want to share with this committee and also with our City Council and other departments that I believe we need to seriously look in to ADUs to increase in neighborhoods to increase our housing options. There are many different companies that are doing ADUs/Tiny Homes/etc and if a plan is developed well, it could be a very viable option for housing that is needed in our city.</p> <p>Thank you,  Lynn Heatley  Ward 3  Nonprofit Director</p>

Item	Name	Neighborhood	Position	Comments
5. HOUSING ELEMENT WORKSHOP - A workshop to update and inform the City Planning Commission about the Phase I General Plan Update - Housing Element, Public Safety Element and Environmental Justice Policies project	Ashton Davis		Oppose	<p>Dear planning commission,</p> <p>Per census data, Ward 4 has the highest concentration of white residents in the city (upwards of 90% racial density in certain census tracts), the highest concentration of wealth, and the most expensive housing. Ward 4 is also has more open space for building than most other wards. It is unacceptable that the ward with the whitest and richest neighborhoods in the city has the least amount of allocated housing (by a wide margin). This is exactly how segregation was accomplished and perpetuated in the 20th century - after the fact zoning and fears of declining housing values (which is a myth) drive cities to perpetuate segregated living conditions and environmental racism.</p> <p>This planning commission must push back on this distribution. Ward four must make room, including routing of transportation, to accept and house lower income peoples and to build affordable housing.</p>



City of Arts & Innovation

Public Comment for March 23, 2021

City Council Meeting

Prepared by the City Clerk's Office at 11 a.m. on March 23, 2021

Agenda Item	Name	Neighborhood	Position	Comments
1. You are invited to participate by phone at (669) 900-6833, and enter Meeting ID: 931 4944 3969 to comment on Closed Sessions and any matters within the jurisdiction of the City Council. Press *9 to be placed in the queue to speak when the agenda item is called. Individuals in the queue will be prompted to unmute by pressing *6 to speak - Individual audience participation is limited to 3 minutes.	Malissa Mckeith		Neutral	Last week, I commented that RPU had awarded a \$90K contract to WSA above the \$750K they already received in 2018. This was not accurate. WSA has a \$750K "ceiling" on tasks which apparently did not include the (90 urban water management plan. Thanks Todd Corbin for the clarification. But the primary comment was that the City needs to integrated its 30/30 strategic plan into the urban water management plan which is due in July, leaving little time for outreach to the EJ, environmental and academic community. The RPU Commission does not have a member dedicated to climate issues and maintaining green space, and the RPU Commission operates without a clear mission to effectuate Council's directives. This is no one's fault but has evolved over time. A way to fix it is to have planning meetings with RPU and Council to set a clearer agenda.
7. Mobility and Infrastructure Committee recommends median opening and traffic signal installation at intersection of Magnolia Avenue and Tyler Street for safety enhancements to serve Northgate Gonzalez Market - 10391 Magnolia Avenue (Public Works) (Ward 6) (10-minute presentation)	Cynthia Mendoza-Collins	Arlington South	Support	<p>Honorable Mayor Patricia Lock Dawson and members of Riverside City Council City of Riverside 3900 Main Street Riverside, CA 92501</p> <p>Subject: Item 7- Discussion Calendar- Proposed Midblock Traffic Signal into Northgate Gonzalez Market</p> <p>Dear Honorable Mayor and City Council Members:</p> <p>I write to urge you all to support the proposed median opening, traffic signal, and safety enhancement installation project on Magnolia Avenue west of Tyler Street to serve Northgate Gonzalez Market which is located at 10391 Magnolia Avenue.</p> <p>As a nearby resident and customer of Northgate Gonzalez Market, it is important to have safe accessibility to this property. Northgate Gonzalez Market has been an asset to not only the La Sierra area but other nearby areas which customers would benefit from this median opening by allowing them to have the opportunity to turn left (coming east on Magnolia) into this property to do business at not only at Northgate, but other businesses in that area as well.</p> <p>The safety enhancements proposed by Northgate Gonzalez Market at Tyler and Magnolia would also benefit the safety issues currently taking place at this intersection, especially with increased vehicle and pedestrian traffic.</p> <p>It is in the best interest of all involved to work together to provide accessibility and safety in order to maintain a positive relationship with this business.</p> <p>Respectfully,</p> <p>Cindy Mendoza-Collins Ward 5</p>



City of Arts & Innovation

**Public Comment for March 23, 2021  
City Council Meeting  
Prepared by the City Clerk's Office at 11 a.m. on March 23, 2021**

Agenda Item	Name	Neighborhood	Position	Comments
7. Mobility and Infrastructure Committee recommends median opening and traffic signal installation at intersection of Magnolia Avenue and Tyler Street for safety enhancements to serve Northgate Gonzalez Market - 10391 Magnolia Avenue (Public Works) (Ward 6) (10-minute presentation)	Norma Barles		Support	<p align="center">March 23, 2021</p> <p>Mayor Patricia Lock Dawson and Members of the Riverside City Council: Request Council Support: Northgate Gonzalez Market Midblock Traffic Signal Dear Honorable Mayor and Members of the Riverside City Council:</p> <p>The Board of Directors of the Riverside LULAC of Riverside Chapter unanimously approved to request your support of Item 7 in today's Riverside City Council agenda. Item 7 is a recommendation from our city Mobility and Infrastructure Committee to construct a median opening and traffic signal installation on Magnolia Avenue west of Tyler Street with safety enhancements at intersection of Magnolia Avenue and Tyler Street to serve Northgate Gonzalez Market. LULAC of Riverside recognizes this recommendation as a benefit to the residents and customers of the area and that it will bring the proper safety precautions and enhance the accessibility of the area. We also recognize these traffic enhancements will improve access to the Northgate Gonzales Market which has been a success in our city collaborating with community organizations and providing a valuable service to all in the short time they have been in Riverside.</p> <p>We encourage your yes vote to item 7.</p> <p>LULAC Riverside 3190 is a charter council of National LULAC, the largest and oldest Hispanic organization in the United States. LULAC advances the economic condition, educational attainment, political influence, housing, health and civil rights of Hispanic Americans through community-based programs operating at more than 1,000 LULAC councils nationwide.</p> <p>Thank you for your consideration. Sincerely,</p> <p align="right">Norma Barles, President LULAC Council 3190 951-897-8670</p> <p align="right">Francisco SolÃ¡ Public Information Officer LULAC Council 3190 951-236-0951</p>
9. General Plan 2025 implementation Annual Progress Report for submittal to Governor's Office of Planning and Research and California Department of Housing and Community Development (Community and Economic Development) (All Wards) (15-minute presentation)	Malissa Mckeith		Neutral	<p>The general plan is being developed piece meal with the housing component developed without regard to other competing goals. I appreciate that this is the result of State mandates on housing, but those mandates are not realistic given the lack of jobs to support 18000 new units. Unless these plans are meaningless, they signal a commitment toward growth beyond what may not be economically sustainable or environmentally wise. for example, building homes at the intersection of the 91 and 60 puts families in the unhealthiest air quality in the country given the diesel trucks. Analyzing these issues in isolation is confusing and costly. Looking forward to staff providing better context.</p>



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**Public Comment for May 3, 2021  
Housing and Homelessness Committee Special Meeting  
Prepared by the City Clerk's Office at 2:37 p.m. on May 3, 2021**

Agenda Item	Name	Neighborhood	Position	Comments
<p>2. City's Phase 1 General Plan, Housing, Public Safety, and Environmental Justice policies updates - Housing Element policies and actions (All Wards)</p> <p>Mary Kopaskie-Brown, City Planner Matthew Taylor, Senior Planner</p>	<p>Janice Rooths</p>		<p>Support</p>	<p>From: Antiracist Riverside in solidarity with Inland Equity Partnership, Center for Community Action &amp; Environmental Justice, and Other Community Members To: Housing &amp; Homelessness Committee Members:</p> <p>We are concerned about racial and economic segregation in the City of Riverside particularly the concentration of whites and wealth in Ward 4, how current zoning, policies, &amp; designated transportation corridors in the Housing Element perpetuate the racial and economic segregation while ensuring density does not increase in Ward 4, and how the focus of this housing element should be developing the types of housing options that build wealth for those who will live in the housing especially very low through middle income residents.</p> <p>You will also be receiving an email with more detail that could not be included here due to space limitations.</p> <p>Thank you for your dedication to quality of life in the City of Riverside. We hope you can also appreciate ours!</p> <p>In Solidarity towards a Better Riverside!</p> <p>Antiracist Riverside</p>



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**Public Comment for June 15, 2021  
City Council Meeting  
Prepared by the City Clerk's Office at 11 a.m. on June 15, 2021**

Agenda Item	Name	Neighborhood	Position	Comments
20. You are invited to participate by phone at (669) 900-6833, and enter Meeting ID: 926 9699 1265 to comment on Consent Calendar items and any matters within the jurisdiction of the City Council. Press *9 to be placed in the queue to speak when the agenda item is called. Individuals in the queue will be prompted to unmute by pressing *6 to speak - Individual audience participation is limited to 3 minutes.	Nancy Magi		Oppose	I remain concerned that the addresses of the Opportunity Sites are not provided to citizens in a user-friendly way. We need a list of these sites by address. When will these lists be available? .01% of our fellow residents watched the Planning Division's presentations. Most citizens are unaware of the drastic, mass zoning changes proposed that are to be voted on in October. Transparency and communication, please. Mailed info to all homes. Many of our citizens are not tech-savvy, and they are being left out of the major planning decisions. Surely the City wants citizens to be aware of this matter.



City of Arts & Innovation

**Public Comment for August 13, 2021  
Planning Commission Meeting  
Prepared by the Planning Division at 8:00 a.m. on August 13, 2021**

Item	Name	Neighborhood	Position	Comments
<p>1. Public Comments: This portion of the agenda will be limited to a cumulative total of 15 minutes, with individual speakers limited to a maximum time limit of 3 minutes. Further discussion of any matter beyond 15 minutes will be continued to following the public hearing calendar or scheduled for a later agenda. If there is no one from the audience wishing to speak, the Commission will move to the next order of business.</p>	Enn Magi		Oppose	<p>SUGGESTED QUESTIONS FOR THE PLANNING DIVISION</p> <p>What communication about this mass zoning change was sent BY MAIL to every citizen or at least every homeowner?</p> <p>Ask if the Planning Division believes that they have done enough to communicate with citizens about the massive zoning change.</p> <p>Ask how many citizens watched Planning Division videos and asked questions about the Housing Element.</p> <p>Ask the Division if they will mail letters to notify property owners adjacent to the 1000 Opportunity Sites stating the City's plan to alter zoning to allow for dense housing/retail.</p> <p>Ask if any member of the Planning Division actually visited the sites of the 1000 lots to determine if the property was a genuine fit for dense housing.</p> <p>Or were properties chosen via satellite maps with no visitations?</p> <p>Ask them to explain in their own words how adding 24,000 dwelling units will impact air pollution.</p> <p>How will traffic be impacted?</p> <p>Do they believe green space is adequate? One answer to that question is to look at the "green space" at the new apartments on Merrill near Trader Joe's.</p> <p>Allowing this massive zoning change and building dense housing in our community will be a calamity from which this City will never recover.</p>



1. Public Comments: This portion of the agenda will be limited to a cumulative total of 15 minutes, with individual speakers limited to a maximum time limit of 3 minutes. Further discussion of any matter beyond 15 minutes will be continued to following the public hearing calendar or scheduled for a later agenda. If there is no one from the audience wishing to speak, the Commission will move to the next order of business.	Nancy Magi
1. Public Comments: This portion of the agenda will be limited to a cumulative total of 15 minutes, with individual speakers limited to a maximum time limit of 3 minutes. Further discussion of any matter beyond 15 minutes will be continued to following the public hearing calendar or scheduled for a later agenda. If there is no one from the audience wishing to speak, the Commission will move to the next order of business.	Marilyn Schumert
1. Public Comments: This portion of the agenda will be limited to a cumulative total of 15 minutes, with individual speakers limited to a maximum time limit of 3 minutes. Further discussion of any matter beyond 15 minutes will be continued to following the public hearing calendar or scheduled for a later agenda. If there is no one from the audience wishing to speak, the Commission will move to the next order of business.	Sharon Dodgson
2. Workshop - Draft Environmental Impact Report - Phase 1 General Plan Update: Housing & Public Safety Element Updates And Environmental Justice Policies - Continued from the August 5, 2021 Planning Commission meeting.	Nancy Embry

Oppose	<p>Planning Commissioners:</p> <p>My name is Nancy Magi. I live in Ward 3 at the intersection of Fairview and Central/Alessandro in a single family residential neighborhood. I am asking questions for nearly 700 residents of Ward 3. Victoria Area Neighborhood Alliance and No to 44 Condos.</p> <p>Before the questions, my statement: You, along with the City Council Members, are our neighborhood advocates. We believe you will consider our words as you face a vote that, if passed, will forever alter the character of our historic City in a negative way. Your vote to move ahead with these proposed revisions to the Housing Element will change single family residential zoning to allow for dense building without notification to adjacent property holders nor will there be an individual hearing as is required now. As we have learned over the last 16 months, the Planning Division's job is not advocacy for the citizens of Riverside.</p> <p>For example, we only found out by accident that a 2.2 acre lot adjacent to our property line was proposed as a 44 unit project which will require massive engineering and the construction of a 19 foot freeway-style wall in an attempt to provide stability of the granite the builder will need to remove to fit in all of these little units. Initially this property was NOT an Opportunity Site, but in recent months, and in mysterious ways, we learned that its status had been altered which will now allow more units to be built. Thank you to our Council Member Ronaldo Fierro for notifying us of this change. The City Division did not have to make that notification because we were an ADJACENT property holder.</p> <p>There are 1000 other lots in the city which the Planning Division has identified through mysterious means - most likely electronic and by vague references to "consultants" none of whom live in Riverside as far as we know. This proposal horrible plan will not require adjacent property holders to be notified. And</p>
Oppose	I'm trying to understand why this commission is moving to single family residences to allow builders to erect apartments. Is the housing shortage so bad that this is the only alternative? There is no land in this city available to build apartments that won't impact the neighborhoods with cars, exhaust, people!! It seems this needs to go back to the drawing board.
Oppose	I object to decisions on places to put future housing until the public is given a detailed map with street names and a definition of the color codes. The present map is inadequate.
Oppose	<p>As a neighboring resident (Woodcrest), I would like to voice my concerns over the infill of high density housing in established communities. Putting a 10 or 14 unit development next door to and in a neighborhood of single family homes is a bad idea. Where will those 40 cars park? Solving one problem and creating another is not a good plan. I have no objection to creating housing, just not in that way. It is unfair to those that have invested in an area/zone to change them without notice or regard for those property owners. They built the city!</p> <p>You might wonder why I would care? I care because I'm sure at some point, Riverside might be looking to annex Woodcrest. Thank you for your consideration.</p>



City of Arts & Innovation

Public Comment for September 9, 2021

City Council Meeting

Prepared by the City Clerk's Office at 4:30 p.m. on September 9, 2021

Item	Name	Neighborhood	Position	Comments
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