



# Pacifica Investments

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SEP 6 2019

Friday, September 06, 2019

City Council  
City of Riverside  
3900 Main Street  
Riverside, CA 92522

Community & Economic  
Development Department

Re: City of Riverside – Riverpointe Project  
ALUC finding of Inconsistency override request for Planning Cases P18-0970 (GPA),  
P18-0971 (RZ), P18-0972 (TTM) & P18-0973 (PRD)

Honorable Mayor and City Council:

The Airport Land Use Commission (ALUC) found this proposed project was inconsistent with the Riverside Municipal Airport Land Use Plan due the site being located within Zone C. We respectfully request the City Council override the ALUC decision on appeal.

The Planning Commission voted to a 3-3 tie on the motion to approve and send this project to City Council for consideration.

We concur with and accept the proposed conditions provide by ALUC in their Staff Report, which would include:

- Providing an avigation easement over the property.
- Noise attenuation measures for house construction to ensure interior noise levels are at or below 45-decibels.
- Restrict exterior lighting to prevent light spillage or reflection into the sky.
- Prohibit various uses regarding light colors, sunlight reflection, smoke or water vapor, or electrical interference to the operation of aircraft.
- Notice to all prospective buyers and renters of the proximity of the airport.

These conditions are similar with conditions required of other projects by ALUC. The conditions have been incorporated as mitigation measures in the project's environmental analysis (Initial Study/Mitigated Negative Declaration). The vast majority of the existing homes lying between our site and Riverside Municipal Airport do not have any of these public noticing or noise attenuation measures incorporated into those properties.

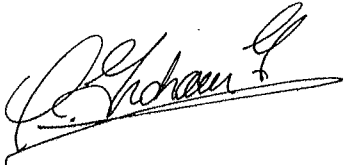
**We respectfully request the City Council override the ALUC decision for the following reasons:**

- a) The proposed project is located nominally 1.6 miles from the end of the Riverside Municipal Airport (RMA) runway (Exhibit 1). The City of Riverside General Plan Noise Element (Figure N-8) shows the project site as being within the 55 to 60 dBA CNEL noise contour level from RMA operations. This noise level is well below the 65 dBA CNEL noise exposure standard deemed to be "normally acceptable" for the environs of RMA in the Riverside County Airport Land Use Compatibility Plan (ALUCP) (Section RI.2, Policy 2.1). There would be no noise-related conflicts between the proposed residential project and RMA.
- b) Airplanes departing westerly and continuing to fly west are required by Riverside Municipal Code Section 12.08.190 and the 2009 Airport Master Plan (Exhibit 2) to follow the Santa Ana River and are not allowed to overfly the existing homes in the area or the proposed project site.
- c) There are currently more than 650 homes located in Zone C and over 170 homes located in Zone B1 that lie between the project site and the end of the RMA runway (Exhibit 3). The vast majority of these 820 homes are located in closer proximity to the airport than the project site.
- d) The proposed residential project is consistent with the residential development for the surrounding areas immediately to the east, north, and south of the property and continues the single family residential development established over the past 40 years. A new subdivision, Tract 28987, is currently under construction to the east of the proposed project site. This subdivision, approved in 2003 with 113 lots, is closer to the airport and is split between the same Zone C and the more stringent Zone B1.
- e) The Zoning and General Plan Designation proposed for the property will match the existing Zoning and General Plan Designation for the area to east, north and south of the property (Exhibit 4).
- f) The current General Plan and Zoning for the property are Commercial and allow for a potentially more intense commercial development, which would bring more vehicular and foot traffic to the site. This would be allowed under existing land use and ALUC rules.
- g) The proposed residential project does not incorporate any of the uses prohibited in Zone C, such as children's schools, day care centers, libraries, hospitals, or nursing homes.
- h) The proposed project site is bounded to the north by Jurupa Avenue, which provides "open land" as defined in Section 4.2.4 of the ALUCP (an area with dimensions of at least 75 feet by 300 feet, free of most structures), and which is available for use for forced landings of light aircraft.
- i) It is the purpose of the Public Utilities Code to protect public health, safety and welfare by ensuring the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas of public airports "to the extent the areas are not already devoted to incompatible uses". The City's position is that the subject site is surrounded on three sides by existing single-family residential development, which is

an incompatible use per the Airport Land Use Compatibility Plan. We request the City to make the finding that based on the surrounding uses previously approved, the area comprising the project was intended to be developed, and the proposed use is consistent with and a logical continuation of the already established development pattern for the area.

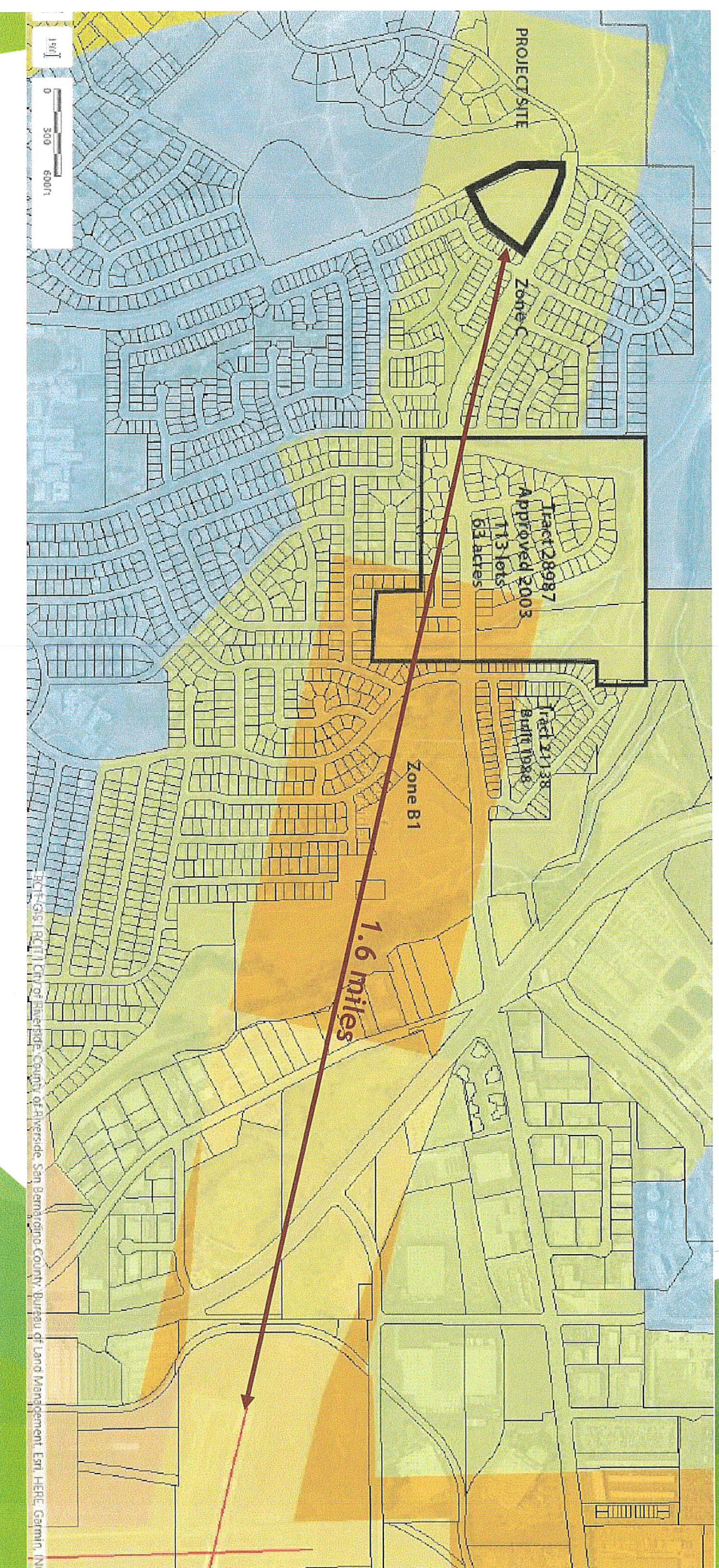
We thank you in advance for your consideration.

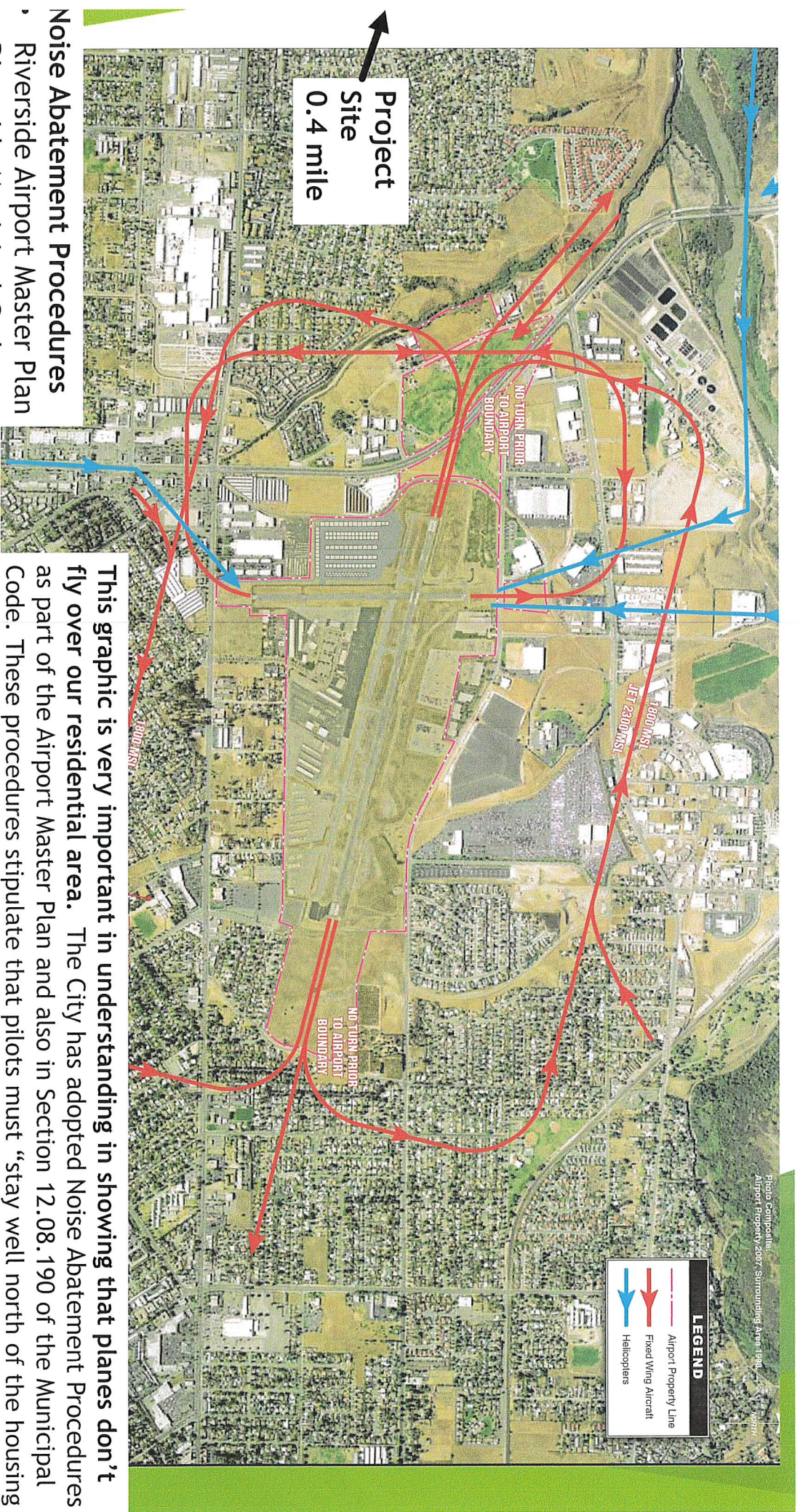
Very Truly Yours;

A handwritten signature in black ink, appearing to read "Oscar Graham", written over a horizontal line.

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Oscar Graham  
Passco Pacifica LLC  
Project Applicant

# ALUC Analysis





**Project Site**  
0.4 mile

- Noise Abatement Procedures**
- Riverside Airport Master Plan
  - Riverside Municipal Code Sect. 12.08.190

This graphic is very important in understanding in showing that planes don't fly over our residential area. The City has adopted Noise Abatement Procedures as part of the Airport Master Plan and also in Section 12.08.190 of the Municipal Code. These procedures stipulate that pilots must "stay well north of the housing area" when using the airport. This is reflected in the arrows to the west of the airport, which direct pilots clearly north of the 800+ existing homes in the area

## Exhibit 3 - Appeal Letter

- ▶ The project site is near the outer edge of Compatibility Zone C. Currently there are:
- ▶ More than 650 homes within Zone C. These homes are even closer to the Airport.
- ▶ More than 170 homes within Zone B1, a more restrictive zone.

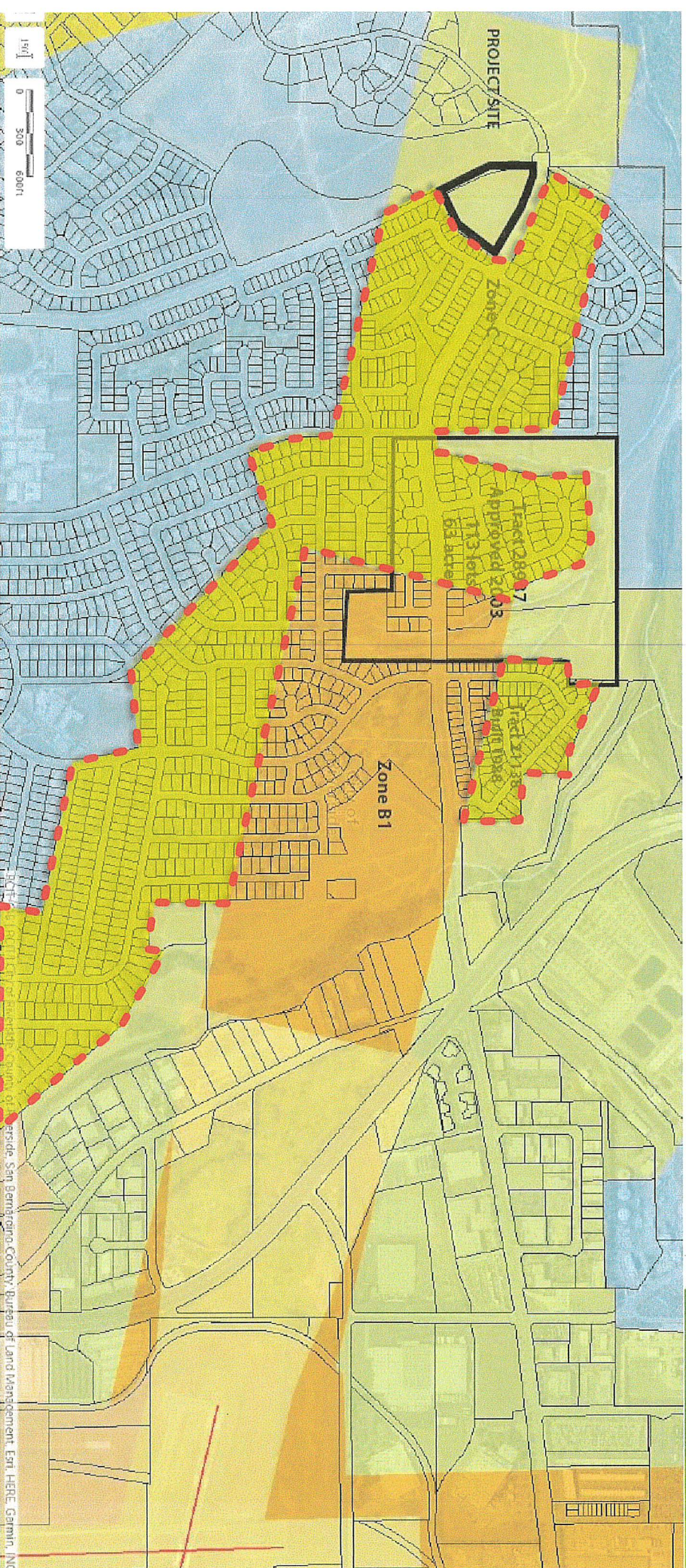
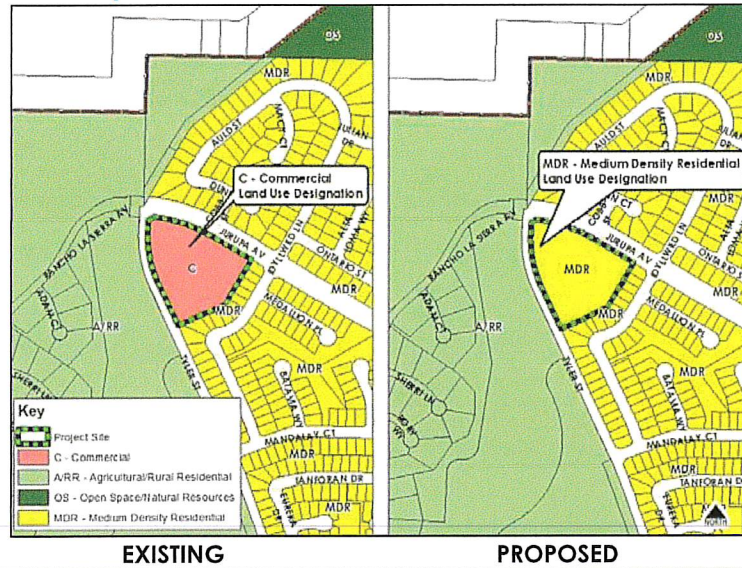


Exhibit 4 - Appeal Letter

### EXISTING/PROPOSED GENERAL PLAN MAP



EXISTING

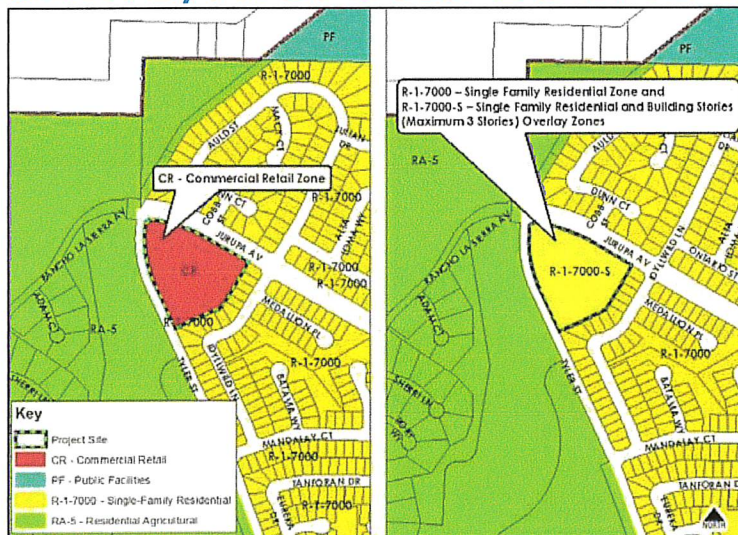
PROPOSED

3



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### EXISTING/PROPOSED ZONING MAP



EXISTING

PROPOSED

4



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