



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

June 13, 2024

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

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

Dear Veronica Hernandez,

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

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

DTSC recommends and requests consideration of the following comments:

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

material meets screening levels outlined in the [Preliminary Endangerment Assessment Guidance Manual](#) for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).

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

Sincerely,



Dave Kereazis

Associate Environmental Planner

HWMP-Permitting Division – CEQA Unit

Department of Toxic Substances Control

[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Veronica Hernandez

June 13, 2024

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cc: (via email)

Governor's Office of Planning and

Research State Clearinghouse

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Tamara Purvis

Associate Environmental Planner

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## California Department of Transportation

AERONAUTICS PROGRAM  
DIVISION OF TRANSPORTATION PLANNING  
P.O. BOX 942873, MS-40 | SACRAMENTO, CA 94273-0001  
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June 24, 2024

Veronica Hernandez  
Senior Planner

Electronically Sent: <vhernandez@riversideca.gov>

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

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

Dear Ms. Hernandez:

The California Department of Transportation, Caltrans Aeronautics has reviewed the Draft Environmental Impact Report for the Mission Grove Apartments. One of the goals of the California Department of Transportation, Aeronautics Program, is to assist cities, counties, and Airport Land Use Commissions (ALUC) or their equivalent, to understand and comply with the State Aeronautics Act pursuant to the California Public Utilities Code (PUC), Section 21001 et seq. Caltrans encourages collaboration with our partners in the planning process and thanks you for including the Aeronautics Program in the review of the Draft Environmental Impact Report.

The proposal is for a total of 347 studio, one-, two-, and three-bedroom residential apartment units within five, 4-story buildings on 9.92 acres. The project will include indoor amenities including a leasing office, clubroom, fitness center, and outdoor amenities including a pool and spa, outdoor seating and dining areas, and a dog park. The project site is located approximately 3.2 miles of the March Air Reserve Base/Inland Port Airport.

In accordance with CEQA, Public Resources Code Section 21096, the California Airport Land Use Planning Handbook (Handbook) must be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries, or if such a plan has not been adopted, within two miles of an airport. The Handbook is a resource for all public use airports and is available online at: <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-ally.pdf>

### Safety Compatibility Policies

The proposed Project site is in Compatibility Zone C2 (Flight Corridor Zone) and the airport influence area (AIA), of the March Air Reserve Base/Inland Port Airport and therefore must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan (ALUCP) adopted by the ALUC pursuant to the PUC, Section 21674. The City of Riverside should

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

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

### **Amending a General Plan / General Plans**

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

### **Basic Statement of Compatibility Concerns (Hazards to Flight)**

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

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

Veronica Hernandez, Senior Planner

June 24, 2024

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

Sincerely,

*Vincent Ray*

Vincent Ray  
Aviation Planner

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

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

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



03-013-2022-002

June 20, 2024

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

**Re: Mission Grove Apartments Draft EIR**

Dear Ms. Veronica Hernandez,

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

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

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

Cordially,

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



**Location  
DEIR**

**COMMENTS/QUESTIONS/REQUEST FOR INFORMATION**

This DEIR does not accurately reflect the final project. The original developer has withdrawn from the project, and it appears that the property owner has assumed the developer role. Obviously the design and associated approach and requirements will change dramatically. Why is the City proceeding with this EIR knowing what is presented therein will not be processed for approvals? How is the City addressing this very important disconnect that will result in changes to the EIR? Will a corrected EIR be issued for public review of the actual project being proposed, avoiding multiple changes? Will subsequent changes have notations of changes (change bars for example) made from the initial version?

Cell phone/WiFi/Internet Carriers: No where in the DEIR is there a discussion of how the cell phone towers may be impacted by the almost 60 foot buildings that are planned. Why was this not considered? Many residents rely on line-of-sight to existing cell phone towers (T-Mobile for example). Can a new study be accomplished to measure this hugely potential problem associated therewith?

- Does the USPS need to be consulted? What is the plan for individual mail delivery?

March JPA recently announced a new development for a Cargo facility, allowing up to 17 additional flights per day. Did this EIR consider that as it relates to traffic patterns, truck traffic (Alessandro and Van Buren in particular, plus increased congestion on the 91 and 215 freeway entrances/exists), noise, pollution, air noise etc.? Will the tenants who decide to rent in this project have to be notified prior to signing an agreement that air traffic exists and may increase in the near future (much like home owners have to disclose when selling their house)?

- What deviations, waivers, changes has the owner already prepared/submitted to consideration of the project (in addition to those included in the DEIR)? How are such changes processed in the future ( i.e.. Are such changes made public and / or voted upon by the City council)?

- The current Owner has stated it's intent to sell this property to a developer if/when this EIR is approved. Why proceed with the EIR then, knowing the developer is TBD and not included in this EIR is ALL aspects? Will a change in ownership require an updated EIR and approval by Planning/City of Riverside? How is this EIR being written/administered so that any future developer must comply with ALL aspects of this EIR? This EIR is already bias in that it was written to support the owner, not the residents of Riverside, and Mission Grove in particular. Why should the City approve a three-sided, 57 feet tall apartment complex that does not fit in with the existing MG General Plan, the only buildings in the MG area four stories tall that will create an eyesore for all who live here and cast concerns about continued community livability/quality of life?

1.0.-1 Will the amenities (including the dog park) be established for public use?

1.0-3 Can rewriting the project objectives to less lofty goals would allow for alternative uses be considered and become more viable?

Says "replace aging building construction". The existing K-Mart was recently build; how is this considered an aging (built in 1991) building?

Says "encouraging walkability". Is this limited to those tenants who eventually reside in the complex? I live nearby and I rarely see anyone walking or bike riding to the existing shopping center. Where is evidence that more people will choose to walk/bike to the existing hopping center?

1.0-4 Will changing the objectives allow for other options to be considered? What is the definition (from an EIR perspective) definition?

1.0-5 Why were alternative sites not considered (only because the owner did not offer any other locations for consideration?)?

1.0-6 Can CEQA guidelines #15093 and #15091 be provided to public review to ensure compliance?

1.0-8 How was it determined here (and other places that say "less than significant") determined and by who?

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

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

- For determining total occupancy density (parking spaces provided), is this calculation before or after the 15% reduction in the requirement addressed earlier?
- 5.9-17 What "improvements will improve delay" are proposed by the Owner and the City? Where is the data/analysis that summarizes peak hour delay from "197.3 to 152.9 seconds"?+B80
- 5.9-22 The total elevation is very close to the PAR 77 requirement. Should FAAOES be reviewed anyway?
- 5.9-27 Has the City Council/Public/Mayor been informed that a 2/3 majority is required to override the Riverside County ALUC decision? What are the pro/cons of presenting this to the City Council for a vote?
- 5.9-28 Airport Land Use Compatibility: How was it determined by the Owner and the City (independently) to be "less than significant"? Does that mean the ALUC is not a serious requirement that must be thoroughly address/discussed and voted upon?
- 5.9-28 The MARB/IPA LUCP for March ARB is not downloadable without Adobe proprietary software. Can this file be provided to the public for review to ensure consistency with statement contained in the DEIR?
- 5.10-7 When will the Green Action Plan update be provided for public review? Again, how will this project satisfy the 20% reduction goals over time (10-20 years from now)?
- 5.11-1 The Mills Water Filtration Plant is NOT operated by WMWD, rather MWD, correct?
- 5.11-2 How is this project addressing "potential noise impacts and inadvertent flight related emergencies", especially with the planned height of almost 60 feet (the tallest type buildings in the area)?
- 5.11-7 How was community collaboration included in development/design/type of project decisions?
- 5.11-8 How was RMC Title 19 (1-10) satisfied in the layout and design of this project?
- 5.11-9 What exactly does "integration of uses...pedestrian connectivity, walkability and shared uses mean? Is this solely related to new tenants in the project? When viewed as a "destination" for pedestrians and bike riders, there is currently very little of such activities, so there really is no benefit to the neighborhood.
- 5.11-10 Why does this section totally ignore/not address the existing housing type of make up of the primarily single home residences? Same question as 5.11-9 above.
- 5.11-12 What new job centers are included in this project? Same question as 5.11-9 above.
- 5.11-13 Policy AQ-1.7: Same question as 5.11-9 above.
- Policy AQ-1.12: How does this project "promote community self sufficiency and discourage automobile dependency, while removing public assess driveways (increased traffic into other entries to the existing shopping center)? As discussed earlier, walk paths/bicycle lockers while touted are of almost zero benefit to the community.
- Policy AQ2-4: Analysis says VMT MAY reduce VMT by 17.7%; where is the analysis to support this declaration. Impact to traffic continues to be MORE THAN SIGNIFICANT. How is the city/owner including in their planning ways to reduce VMT numbers and reflect the community concerns about obvious increase in overall traffic driving down Alessandro Blvd, timing of lights that would create more bottlenecks, and longer transit time (car idling waiting for lights to change) to local residents?
- 5.11-14 Why should the public be forced to accept a project that "would not be consistent with the current General Plan land use designation"?
- 5.11-15

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

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

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

RESPONSE TO MG DEIR

- Is this describing individual A/C, heating ventilation for individual dwellings (that is, will each unit have its own equipment or will whose units be shared)? If not individual units, how will tenants be able to customize the output to their personal satisfaction?
- Are double pane windows a requirement for "Green Construction Goals, both individual units and the overall facility? If not, why? Again, measurements are made with doors and windows closed; what if tenant chooses to open windows and doors for personal preference?
- 5.13-21 "Long Term Ground Borne Noise" is not addressed in the narrative. Why not? And if so, what narrative should be added?
- 5.13-24 "What other planned and pending development" are there? Will less than significant still apply when the questions/comments here are corrected/addressed?
- 5.14-3 What job center and institutional is resulting from this project?
- What is being done to discourage automobile dependency (for workers that cannot walk, bike or RTA to work? And "reduced vehicle trips"?)
- 5.14-4 Topic discussed the project will increase City population by 1.4%. How is this going to affect the population growth for the MG planned community?
- How is the project impacting pre-school, elementary, middle and high school enrollment? What transportation methods are being made available to children to attend school (noting that delivery to/from school will increase vehicle traffic; should traffic patterns include these type of trips also)?
- 5.15-2
- 5.15-5 What is planned access to top floor dwellings, for example, to permit emergency ingress/egress? Are elevators/escalators/lifts included in the design? Did the RFD / ambulance services/RPD and County services agree that the "Project will UNLIKELY contribute to the need for additional services, staff or equipment (high lift ladders for example to reach the top floors)? The narrative talks about the City in general, but what about MG planned specific needs? Will the master MG Plan need to be modified as well?
- 5.15-8 Taxes are paid by all residents, including new Project. These go into general funds. Will the increased property taxes be identified for MG area?
- 5.15-9 What fees will be paid to the developer? And paid to whom (public record)?
- 5.16-2 How is the project contributing to objectives identified in 5.16.2.3 (especially "open space" in this high density design)?
- 5.16-4 How will environmental Impact change if the estimated population is greater than 829 persons? Should a contingency estimate be prepared? The narrative discusses Riverside in general' why not properly address MG location?
- What will be the amount of "impact and Park Development" fees paid to the city (public record)? These fees could change to "less than significant impact" to a higher impact, could it not?
- 5.17-33 Explain why a 15% below VMT was used.
- Increased traffic will result from this Project. Throughout the DEIR, little discussion is adequity addressed; rather is exists already and therefore the traffic increase is unavoidable. What concepts has the City/Owner developed to offset this enormous concern for residents? Can the local law be changed to better monitor/ticket violators that speed on Alessandro, and allow trucks to illegally use this road to reach its destination? Can enforcement be increased to accomplish fewer trucks and lower speeds? How about lower size/weight restrictions be placed on trucks (perhaps using the money given to the City for traffic increases)? Can the City study these areas of concern, using the money received from the Project, to B145develop new/better ways to mitigate the increase traffic that will result from this project (calming to use City description).
- 5.17-5/6/7 Lots of "could, may and should" comments. Are there studies (from Amazon for example) that support these what if's?
- 5.17-8

RESPONSE TO MG DEIR



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

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

RESPONSE TO MG DEIR

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

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

RESPONSE TO MG DEIR



RESPONSE TO MG DEIR

complexes adjacent to

RESPONSE TO MG DEIR

**From:** Andrew Huben <a.huben@icloud.com>  
**Sent:** Sunday, June 23, 2024 8:05 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Dear Ms. Hernandez:

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

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

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

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

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

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

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

### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,



Name, and address  
Mission Grove Neighborhood Alliance

Andrew Huben

**From:** annette myers <myersat@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 8:33 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Section 5.9.6

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

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

#### Summary

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

Thank you for your consideration of this letter.

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

Sent from my iPhone

**From:** annette myers <myersat@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 8:33 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Section 6.2

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

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

#### Summary

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

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

Thank you for your consideration of this letter.

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

Sent from my iPhone

**From:** annette myers <myersat@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 8:31 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

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

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



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

### Summary

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

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92508  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** annette myers <myersat@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 8:30 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Alternative Uses - Section 7.0.5

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

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

#### Summary

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

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19144 White Dove Lane  
92508  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** annette myers <myersat@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 8:29 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
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More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.4

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

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

### Summary

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

Thank you for your consideration of this letter.

Sincerely,

Annette Myers  
19144 White Dove Lane  
92508  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** annette myers <myersat@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 8:27 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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VHernandez@riversideca.gov

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

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Alternative Uses - Section 7.0.6



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

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

### Summary

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

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Thank you for your consideration of this letter.

Sincerely,

Annette Myers  
19144 White Dove Lane  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** annette myers <myersat@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 8:35 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
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2022100610

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

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

Section 6.1

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

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

### Summary

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

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

Sent from my iPhone

**From:** Arnold Allende <allendefamily90@yahoo.com>  
**Sent:** Sunday, June 23, 2024 10:03 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

## Summary

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Thank you for your consideration of this letter.

Sincerely,

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

Mission Grove Neighborhood Alliance

Sent from my iPhone



**From:** Arnold Allende <allendefamily90@yahoo.com>  
**Sent:** Sunday, June 23, 2024 10:01 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Sincerely,

Nancy Allende  
902 Cannon Road  
Riverside, CA. 92506

Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Arnold Allende <allendefamily90@yahoo.com>  
**Sent:** Sunday, June 23, 2024 9:59 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

Arnold Allende  
902 Cannon Road  
Riverside, CA. 92506

(951) 809-7327  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Arnold Allende <allendefamily90@yahoo.com>  
**Sent:** Sunday, June 23, 2024 10:05 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

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

Section 5.17.5

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

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

#### Summary

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

Thank you for your consideration of this letter.

Sincerely,

Rosa Allende  
6802 Mission Grove Parkway N  
Riverside, CA. 92506



Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** barbararvrsd <barbararvrsd@aol.com>  
**Sent:** Sunday, June 23, 2024 7:54 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Dear Ms. Hernandez:

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

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

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

I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6

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

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

#### Summary

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

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

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

Thank you for your consideration of this letter.

Sincerely,  
Barbara Christie  
6848 Rycroft Dr.

Riverside CA 92506

Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

**From:** barbararvrsd <barbararvrsd@aol.com>  
**Sent:** Monday, June 24, 2024 11:12 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

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

#### Section 5.16.4

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

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

#### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,  
Barbara Christie  
6848 Rycroft Dr.  
Riverside CA 92506

Mission Grove Neighborhood Alliance

Sent from my Verizon, Samsung Galaxy smartphone

**From:** Bill Clark <pop92517@gmail.com>  
**Sent:** Sunday, June 23, 2024 8:30 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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



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

Bill Clark  
541 Atwood Ct, Riverside, CA 92506

**From:** Bill Clark <pop92517@gmail.com>  
**Sent:** Sunday, June 23, 2024 8:31 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: [VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov) RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 1.3 The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking. • This is an unsupported statement that makes unsupported assumptions. This is a proposed apartment building that will replace a large portion of a commercial facility that was designed to support the neighborhood. There is no market data to support this project. • Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change? • How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential? • Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed

for car-dependent retail? • What specific shared elements, including parking, are planned between the residential and retail components, and how will these be implemented without negatively impacting the existing retail operations? • Given that the project will replace a portion of a commercial facility designed to support the neighborhood, how do you plan to mitigate the potential loss of retail services and ensure that the new development still meets the community's needs? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Name, and address Mission Grove Neighborhood Alliance

Bill Clark  
541 Atwood Ct, Riverside, CA 92506

**From:** Chris Bardeen <cbardeen951@gmail.com>  
**Sent:** Sunday, June 23, 2024 1:01 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Comments on Draft EIR for Mission Grove Apartment Project  
**Attachments:** [Kmart EIR letter-1.pdf](#)

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

Dear Ms. Hernandez,

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

Thanks, Chris

Chris Bardeen  
238 Gracefield Way  
Riverside, CA 92506

**From:** David Nunez <dpnhome@yahoo.com>  
**Sent:** Sunday, June 23, 2024 10:29 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 5.14.6 Environmental Impacts before Mitigation - Threshold A: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) • Yes, the project could have as many as 6 people in a one bedroom, potentially doubling the projected occupancy of 839 to over 1600, the population implications have not considered this issue as it relates to the local community of Mission Grove with less than 8000 residents. It's the unplanned population growth to the local community that has not been examined. • Can you provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit? • How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections? • What measures will be implemented to monitor and manage the actual occupancy rates of the residential units to ensure they align with the projected numbers and do not lead to unplanned population growth? • Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents? • Can you provide examples of similar projects where unplanned population growth was effectively managed, and what strategies from those projects will be applied to mitigate potential impacts in Mission Grove? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and

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

**From:** David Nunez <dpnhome@yahoo.com>  
**Sent:** Sunday, June 23, 2024 10:29 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

**From:** David Nunez <dpnhome@yahoo.com>  
**Sent:** Sunday, June 23, 2024 10:28 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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



**From:** David Nunez <dpnhome@yahoo.com>  
**Sent:** Sunday, June 23, 2024 10:29 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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**From:** Deb Whitney <surfjade@yahoo.com>  
**Sent:** Sunday, June 23, 2024 4:33 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Sincerely

Deb Whitney  
6790 Mission Grove Pkwy N  
Riverside, CA 92506

**From:** The Adams Family <theadamsfamilyonline@gmail.com>  
**Sent:** Sunday, June 23, 2024 9:38 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Dear Ms. Hernandez:

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

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

Alternative Uses - Section 7.0

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

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

#### Summary

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

Thank you for your consideration of this letter.

Sincerely,

J. Adams  
Mission Grove Neighborhood Alliance

**From:** James Medlin <jhmedlin@yahoo.com>  
**Sent:** Tuesday, June 25, 2024 6:58 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

**From:** Jason Anthony Espinoza <JasonAnthony.Espinoza@calbaptist.edu>  
**Sent:** Sunday, June 23, 2024 12:20 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
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2022100610

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



#### Section 5.11.2.4

1. Mix land uses.2. Take advantage of compact building design.3. Create a range of housing opportunities and choices.4. Create walkable neighborhoods.5. Foster distinctive, attractive communities with a strong sense of place.6. Preserve open space, farmland, natural beauty and critical environmental areas.7. Strengthen and direct development toward existing communities.7. Strengthen and direct development toward existing communities.9. Make development decisions predictable, fair and cost effective.10. Encourage community and stakeholder collaboration in development decisions.

- Putting a large high density residential project in the middle of a suburban neighborhood does not satisfy any of these principles.
- How does your proposed high-density residential project in a suburban neighborhood align with the principle of strengthening and directing development toward existing communities, rather than expanding into less developed areas?
- Can you provide specific examples of how your project will create a walkable neighborhood and foster a distinctive, attractive community with a strong sense of place, given its location in a primarily suburban setting?
- How does your project plan to preserve open space and critical environmental areas, considering it's introducing a high-density development into a less densely populated area?
- What measures are you taking to ensure a range of housing opportunities and choices within your project, and how does this diversity fit within the context of the existing suburban neighborhood?
- How have you incorporated community and stakeholder collaboration in your development decisions, particularly in addressing concerns about the project's compatibility with the suburban character of the area?

#### Summary

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Thank you for your consideration of this letter.

Sincerely,

Name, and address  
Mission Grove Neighborhood Alliance

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**From:** Jason Anthony Espinoza <JasonAnthony.Espinoza@calbaptist.edu>  
**Sent:** Sunday, June 23, 2024 12:19 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
of Riverside, Planning Division Email:  
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2022100610

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

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

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

## Summary

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

Thank you for your consideration of this letter.

Sincerely,

Name, and address  
Mission Grove Neighborhood Alliance

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**From:** Jason Anthony Espinoza <JasonAnthony.Espinoza@calbaptist.edu>  
**Sent:** Sunday, June 23, 2024 12:18 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
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More specifically, I would like to comment on the following sections related to the EIR:

## Alternative Uses - Section 7.0.5

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

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

### Summary

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**From:** Jason Anthony Espinoza <JasonAnthony.Espinoza@calbaptist.edu>  
**Sent:** Sunday, June 23, 2024 12:20 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

## Section 6.2

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

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

### Summary

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

Thank you for your consideration of this letter.

Sincerely,

Name, and address  
Mission Grove Neighborhood Alliance

Sent from my T-Mobile 5G Device  
Get [Outlook for Android](#)

**From:** Jen L <jlarrattsmith@gmail.com>  
**Sent:** Sunday, June 23, 2024 8:04 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)

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

Dear Ms. Hernandez:

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

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

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

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

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

## Alternative Uses - Section 7.0.2

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

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

### Summary

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

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

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

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

Thank you for your consideration of this letter.

Sincerely,

Jen Larratt-Smith  
Mission Grove Neighborhood Alliance

**From:** Jenny Snodgrass <jjsnodgrass56@gmail.com>  
**Sent:** Sunday, June 23, 2024 5:40 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: [VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov) RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 2.3 The City held a virtual EIR Public Scoping Meeting on November 2, 2022, from 6 PM to 7 PM. • No data has been provided on how this meeting was communicated and how many residents attended. • Can you provide detailed information on the methods used to communicate the virtual EIR Public Scoping Meeting to the community, including the platforms and channels used for notification? • How many residents attended the virtual EIR Public Scoping Meeting on November 2, 2022, and can you provide a summary of the key concerns or comments raised during the meeting? • What steps were taken to ensure that all potentially affected residents were informed about the meeting, and how did you address any barriers to participation, such as digital access or language differences? • Can you provide data on the overall community engagement efforts for this project, including the number of comments received, the demographic breakdown of participants, and any follow-up actions taken in response to community feedback? • How do you plan to improve future community engagement efforts

to ensure broader and more effective participation, particularly for residents who may have been unaware of or unable to attend the initial virtual scoping meeting? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely,

Jenny J. Snodgrass

6741 Berylwood Ct

Riverside, CA 92506

Mission Grove Neighborhood Alliance



**From:** Jenny Snodgrass <jjsnodgrass56@gmail.com>  
**Sent:** Sunday, June 23, 2024 5:38 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Sincerely,

Jenny J. Snodgrass

6741 Berylwood Ct

Riverside, CA 92506

Mission Grove Neighborhood Alliance

**From:** Jenny Snodgrass <jjsnodgrass56@gmail.com>  
**Sent:** Sunday, June 23, 2024 3:04 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Sincerely,

Jenny J. Snodgrass

6741 Berylwood Ct

Riverside, CA 92506

Mission Grove Neighborhood Alliance

**From:** Jenny Snodgrass <jjsnodgrass56@gmail.com>  
**Sent:** Sunday, June 23, 2024 3:01 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

**From:** Jenny Snodgrass <jjsnodgrass56@gmail.com>  
**Sent:** Monday, June 24, 2024 11:08 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Mission Grove Neighborhood Alliance



**From:** Judith Schumacher-Pronovost <judithpronovost@mac.com>  
**Sent:** Monday, June 24, 2024 5:11 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Dear Ms. Hernandez:

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

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

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

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

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

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

### Summary

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

I worry about traffic which is already heavy.

I worry about water use.

I worry about overcrowding in our schools.

Thank you for your consideration of this letter.

Sincerely,

Judee Schumacher Pronovost  
Y614 Blackwood Street  
Riverside, CA 92506  
Mission Grove Neighborhood Alliance

Judee  
Sent from my iPad

**From:** Larissa Dobrzhinetskaya <larissa@ucr.edu>  
**Sent:** Sunday, June 23, 2024 9:35 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

Section 5.9.6

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

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

#### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

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

Sent from my iPhone

**From:** Larissa Dobrzhinetskaya <larissa@ucr.edu>  
**Sent:** Sunday, June 23, 2024 9:33 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

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

Section 6.2

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

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

### Summary

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

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

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Larissa Dobrzhinetska  
19148 Vintage Woods Drive, Riverside, 92508



Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Larissa Dobrzhinetskaya <larissa@ucr.edu>  
**Sent:** Sunday, June 23, 2024 9:31 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
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2022100610

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

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

Section 5.17.5

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

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

#### Summary

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

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Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Larissa Dobrzhinetskaya <larissa@ucr.edu>  
**Sent:** Sunday, June 23, 2024 9:30 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Section 5.17.5

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

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

## Summary

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Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Larissa Dobrzhinetskaya <larissa@ucr.edu>  
**Sent:** Sunday, June 23, 2024 9:28 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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



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

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

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Sincerely,

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

Sent from my iPhone

**From:** Larissa Dobrzhinetskaya <larissa@ucr.edu>  
**Sent:** Sunday, June 23, 2024 9:26 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
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2022100610

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

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

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

### Summary

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Mission Grove Neighborhood Alliance

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**From:** Larissa Dobrzhinetskaya <larissa@ucr.edu>  
**Sent:** Sunday, June 23, 2024 9:25 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Alternative Uses - Section 7.0.4

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

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

### Summary

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19148 Vintage Woods Drive, Riverside  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Larissa Dobrzhinetskaya <larissa@ucr.edu>  
**Sent:** Sunday, June 23, 2024 9:21 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Alternative Uses - Section 7.0.6

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

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

### Summary

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**From:** Larissa Dobrzhinetskaya <larissa@ucr.edu>  
**Sent:** Sunday, June 23, 2024 9:36 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Section 6.2

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

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

#### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

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

Sent from my iPhone

**From:** L S <nichole19161@gmail.com>  
**Sent:** Monday, June 24, 2024 11:23 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Mission Grove Apartments PR-2022-001359 Draft EIR Comments

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

Veronica Hernandez, Senior Planner City  
of Riverside, Planning Division Email:  
[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)

RE: Mission Grove Apartments PR-2022-001359, State Clearinghouse  
No.2022100610 EIR Draft EIR Comments

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

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

back on the construction completion being 2027 and 2028. What year is it anticipating being complete? I live in a single family home community that is 115 ft from this proposed project and this construction is going to greatly affect our quality of life. We need to know. Please decide which year it is going to be and make it consistent through all documents.

6. **Section 5.1, Figure 5.1-8:** Lighting plan. Single family residences are less than 115 ft from the project entrance on Mission Village Drive. The lighting plan shows multiple varieties of lighting fixtures that will be visible from the backyards of the single family residences in the Creekside HOA community. How bright will these various lights be? What type of study was done to ensure these various lighting fixtures (bollard, theme pole light, wall mounted light, overhead festival lighting, etc) will not cause light pollution issues for the single family home residents on Mission Village Drive. Light pollution can have negative effects on humans, wildlife and the environment such as disrupting human sleep and creating increases in carbon dioxide in the atmosphere, among other things.  
(<https://education.nationalgeographic.org/resource/light-pollution/>). On **page 5.1-22**, it states that the project is located in a CR commercial zone, lighting zone 3. This project is not going to be zoned as commercial. Does Mixed use-urban zoning have the same lighting zone as commercial?
7. **Section 4.3, P 4.0-1:** Since much of this DEIR is stale and mostly written off of information from two years ago in 2022, there are additional projects in various phases in the area that should also be accounted for in regards to the "cumulative impacts" that are going to impact our community. This DEIR used a Focused Traffic Analysis (TA) from 2022 (in Appendix I.) In reviewing Riverside Planning Dept. online current map for citywide cumulative projects, there are new proposed projects as well as some already in construction that will contribute to environmental concerns with greenhouse gases, noise and traffic delays. In the same shopping center, a few doors down from this proposed project, there is an empty retail building that is slated to be a gym. Nowhere in this DEIR is that project taken into account. Adding a gym is going to add to the VMT in the surrounding area, resulting in more noise, more traffic, more pollution and more unsatisfactory LOS on surrounding streets already being burdened. Right across the street in Mission Village Shopping center, approx. .3 miles away, there is a proposal for construction of two commercial buildings totaling 24,700 sf. In that same center, there is a proposal to renovate and expand the existing Arco gas station, their car wash as well as add a 2,220 sf fast food restaurant. Also in that same center is a new 3,500 sf Panera Bread restaurant and drive thru currently under construction. There are also at least three proposed projects on Van Buren Blvd. that are approx. 2.2-3.7 miles away: A 4,319 sf Panera Bread Restaurant and drive thru, a 74 unit multi family residential development, a 4,300 sf Denny's restaurant and a 9,920 office building, a 69,316 sf expansion of Woodcrest Christian School which will increase their student count from 720 students to 1,000, and a 24 unit 21,723 sf multi family residential development. These projects off of Van Buren Blvd. should be added because Van Buren is heavily traveled by residents in Mission

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

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

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

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



12. **Section 5.3, (5.2.3.4):** Once again, the GP 2025 is referenced for its air quality element. That element can not be counted as reliable in 2024, as it has not been updated since 2007. We have so much more pollution, traffic and noise due to extreme growth, particularly with multiple warehouses built in the proposed project area, resulting in an abundance of trucks on the road contributing to greenhouse gases among other pollutants. The information in the GP 2025 does not reflect current area conditions.
13. **Section 5.3 (5.3.5):** In regards to fugitive dust, on **page 5.3-21**, it states that watering the site is to be done at least two times a day, but on **page 5.3.29** (BACM AQ-1) states the project should be watered three times a day. **Appendix B, P.23** states that active site should be watered at least two times a day. Please decide if it is a minimum of two or three times a day to water the site and make it consistent throughout the DEIR and appendix.
14. **Section 5.3, P. 5.3-27:** DEIR states that this project is anticipated to be short term (1- 2 yrs) and therefore not subject to long term DPM emissions. Stating the project is only 1-2 yrs is inaccurate. Multiple areas in the DEIR and Appendices conflict when stating how long the construction will be. There is a statement that the project is 28 months, which is 2 yrs 4 months, not 1-2 years as stated on P 5.3-27. Additionally, there are numerous times it states the construction is complete in 2027 and other pages state 2028. What is correct? Please be consistent throughout your documents.
15. **Section 5.9, P. 5.9.19:** The proposed project will have 40,000 sf of solar panels on the roofs and on the carports. The DEIR only analyzes the effects of the solar panels in regards to airplanes. There is a sensitive receptor within 115 feet, the single family homes in the Creekside HOA off of Mission Village Drive. There is a whole street of homes whose backyard and windows face the project. Will there be issues with glare for the single family homes? Do you do any studies on solar panels how it can affect nearby homes for issues such as glare, flash or glint? Solar panels are also mentioned in **Section 5.11, P. 5.11-56**, once again not mentioning any glare effects on the residential homes 115 sf away.
16. **Section 5.15 (5.5.6):** Both fire stations that are referenced in this DEIR are fairly small, only four firefighters per station. Has this project been discussed with the Riverside Fire Department to confirm if they have adequate resources for the high density apartment project. I am concerned because these two stations are not used to taking calls from four story apartment buildings, whether it be fighting a fire or for medical aid. I spoke with a fire captain who has over 25 years of experience in urban settings and he does not think these two stations are adequately prepared to fight a fire at this four story five building project. The buildings our firefighters are used to are two story buildings, single family homes and light commercial/retail. Two story apartment fires will be a 1-2 alarm fire, which is about 4-5 engines, 3-4 truck(ladder) companies. A four story complex is going to take double the amount of resources. Our two stations nearby would NOT be adequate in this situation and would need the help from stations further out, which would result in a longer wait time to save life, property and environment. I'm very

concerned about their ability to adequately fight the fire in a timely manner, especially since my single family home community is just 115 ft away from this proposed project. About 90% of calls dispatched to the fire dept. are for medical. The DEIR states that fire station #11 can get there in three minutes (unlikely with our unsatisfactory LOS on all streets in the area), but did you account for the time to get into the project as well as them having to figure out what building and unit the call originated from? That adds critical minutes to them reaching a person who may be in medical distress. It only takes between 4-5 minutes for heart & brain death to occur without CPR. Then after getting the patient, you have to get them to an ambulance. What are the dimensions of the elevators? Are they big enough to handle multiple firefighters with their gear, paramedics with their gear and a gurney? If this proposed project is approved, I recommend the local fire departments are instructed to familiarize themselves with the layout of the complex so they aren't going in blindly when they get calls for service. Is there any documentation from Riverside Fire that they are adequately trained and can deal with fire calls for a five building, four story too high density apartment complex fire?

17. **Section 5.11, P. 5.11-25:** The GP 2025 (2007) states the development will ensure there is adequate parking provided. While the 513 parking spaces provided may sound adequate, it simply is not for a project with this high density. Several of the parking spots are tandem, which renders them unusable to many. Several are for EV charging, which I believe are also to be used by non residents. Table 3.0-4 shows one bedroom units are allowed 1.5 parking spots. What is your definition of a .5 parking spot? How is it determined what one bedroom renter gets the parking spots, as there clearly won't be enough for all the one bedroom units. It appears that many of the parking spaces are outside of the gated complex. Is that the 91 shared spaces? It is first come first serve? Is there not a dedicated spot for apartment guests to park? With the anticipated EOS gym being constructed in that center, there are going to be serious issues with parking for the residents that are there to use the Mission Grove Shopping centers various businesses. These businesses, such as the gym, Stater Bros, nail shop, Cookie shop, etc are guaranteed to lose customers due to the lack of parking available because it is going to be overtaken by the apartment renters and their guests. At peak times every day, it can be hard even now to find parking for Stater Brothers. Were the existing shopping center anchor tenants even consulted on the parking issues this proposed project is going to cause? I am concerned with residents and their guests parking on Mission Village Drive. Parking is only allowed on one side of that street and the residents of my community (Creekside HOA) need those spaces to be available for street sweeping days as well as when we have our streets slurry coated. If this project goes through as is, this development will not be a good neighbor to our community. We will have to go to the city and ask that streets be restricted for single family home use and issue us permits, put up additional signs regarding parking permits and then we'd need some code enforcement for it. Who is going to pay for that? The city and us taxpayers will have to pay for it when it should be an issue addressed by this DEIR and paid for by the developer.

18. **Appendix I, 2.4- VMT Reduction Measures:** This section suggests unbundling residential parking cost from the property costs by giving all apartments one parking spot but charging an additional \$75 to only studio and one bedroom renters if they want an additional spot. That statement does not make sense. On one hand you are saying ALL apartments (studio, one bedroom, one bedroom +den, two bedroom and 3 bedroom) are given one spot, so are you not charging the bigger apartments for their second spot? Are you saying the larger apartments are still getting their two spots for free? California has passed AB 1317, which states all parking spots must be paid for and separately from the rent. This is to go into effect in January of 2025, so this proposed project is subject to the requirements of this new bill, and this is not reflected as such in this DEIR or its Appendices. I am under the impression from this new bill that you must charge for all 513 parking spots. How would you charge for the 58 tandem spots? Are there really only 29 tandem spots but since they fit two cars, you are technically counting them as two spots? Those spots aren't practical, especially if they have to be rented and shared by two different apartments. Regarding the garages, is there access to any apartments from within any of those 182 garages, therefore exempting them from the bill? Realistically, charging people for parking spots is doing nothing to reduce VMT in an area that does not have access to many amenities, jobs or public transit. Everyone who rents at this proposed project and pays high dollars for rent, is going to have 1+ vehicles guaranteed. Charging for parking spots is only going to make the car owners seek out the free parking in the commercial/retail areas as well as parking on Mission Village Drive. This is going to cause hardships for the surrounding community residents and limit our parking options because we have to drive to these services since this community is limited in services. This is going to result in the existing businesses losing customers. I've been to community meetings and residents are already saying they will go elsewhere. I'm sure Michelle Rubin doesn't want her tenants to lose business. Bottom line is that none of the VMT reduction measures listed are going to do enough to reduce the impact to less than significant level, and the proposed project is still going to have a **significant transportation impact** under CEQA. That is not okay.

19. **Appendix E:** It is stated that there are zones of hard bedrock at depths requiring heavy ripping, use of breakers or "other" industry standards since blasting can not be used due to a sensitive receptor 115 ft away (single family homes). What is considered "other" industry standards that are used in place of blasting near sensitive receptors? What will the dBA be for these other means of breaking up bedrock? If you are going to use equipment that is going to break up hard bedrock, I am assuming that there will be extra disruptive noise, worse air quality and disruption to the sensitive receptor area (single family homes 115 ft away), be a good neighbor and please provide advance notification so residents can plan accordingly, This geotechnical report was written in June 2022, and it state that it should NOT be relied upon after three years. This report is now over two years old. If this proposed project is still going to the approval processes with the City, will you be conducting another updated geotechnical report?

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

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

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

a large airplane can safely land? Show the research. There will be no room and the parking will be all used if this project is built as proposed in this DEIR.

27. **Section 5.6.2.4, P 5.6-11:** The DEIR used Riverside Public Utilities (RPU) 2018 Integrated Resource Plan (IRP) as the guide for assessing the availability of electricity to the project. RPU came out with a new IRP in 2023. **Section 5.6.5 (P. 5.6-16),** states the project is consistent with the 2018 IRP goals. Since the 2018 IRP was written, significant legislation and regulations have occurred that have a potentially significant impact on both RPU and its customers, therefore the 2018 IRP should not be used to assess RPU's energy capabilities in relation to providing adequate service to this project and the city as a whole. The EIR needs to use the current IRP (<https://online.fliphtml5.com/ltghc/qrro/#p=1>).
28. **Appendix I & DEIR Section 5.17:** The project design will not be effective in alleviating circulation/queuing issues or VMT. The DEIR projection of 829 residents is on the very low side and based on a less accurate and biased source, the city. With that amount being incorrect, how can you surmise there will only be 1,464 vehicles a day going in and out of the project? Appendix I notes in general that the study should not exceed a five mile radius unless there is evidence to justify a larger area, This project LOS and VMT assessments failed to take in a larger radius when it is needed to clearly reflect where the new tenants will need to drive. I consider myself an expert when it comes to driving the streets of Mission Grove and Orangecrest after living here for almost 28 years. This LOS/VMT analysis failed to account for where the apartment residents will be going, to include taking kids to school or daycare, going to the park, going to medical facilities, going to college, going to work. This project is trying to be represented as a live, work, shop type of place but we all know this is not the case. The Mission Grove area is more suburban than urban. The shopping centers are run down and have vacancies. There are not enough good businesses or services within walking distance in Mission Grove. While I may walk from my house, which is right next to this proposed project, to get a coffee or lottery ticket, I still need to drive to get groceries. I can't possibly carry all the grocery bags home without having a car. There are not enough dining or entertainment in the shopping center to keep residents out of their cars. The study area needed to include the streets that lead to all the schools in Mission Grove and Orangecrest, as school traffic adds a large amount of traffic. Why did you not do a study that included the routes to schools, to include Wood Road and further down Trautwein? There will be many kids in this project if approved. If I see that it is school time, I avoid all those streets because it is LOS F. This DEIR states that the traffic from when the Kmart was open, created more traffic than these apartments will. Where do you have the documentation to prove that? That can not be true. Additionally there have been so many projects built in the last few years that have increased traffic exponentially more than what your old studies show. Did you do any studies that reflect the traffic issues that are going to transpire due to two of the Mission Grove Shopping Center losing two of the entrances and exits, Plaza Driveway two and driveway three? By taking away those two ways for retail customers to access the shopping center, it is going to create

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

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

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

Laura Sandidge  
19161 Vintage Woods Drive  
Riverside Ca 92508  
[nichole19161@gmail.com](mailto:nichole19161@gmail.com)





**From:** Lena Johnson <ronlenajohnson@gmail.com>  
**Sent:** Monday, June 24, 2024 7:11 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

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

Alternative Uses - Section 7.0

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

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

#### Summary

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

Thank you for your consideration of this letter.

Sincerely,

Magdalena Johnson  
19186 Vintage Woods Dr  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Lena Johnson <ronlenajohnson@gmail.com>  
**Sent:** Monday, June 24, 2024 9:33 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
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VHernandez@riversideca.gov  
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2022100610

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

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

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

Alternative Uses - Section 7.0.2

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

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

## Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

Magdalena Johnson  
19186 Vintage Woods Dr Riverside Ca  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** ljmallen@aol.com  
**Sent:** Monday, June 24, 2024 3:21 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Fw: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610  
**Attachments:** [EIR Response Apartments 2022100610.pdf](#)

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

Comments are below.

I have also attached a PDF version of this email.

Thank You

LJA

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

[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)

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

Dear Ms. Hernandez:

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The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific

Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base.

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

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

#### Section 5.9.6

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

1. What specific factors contribute to the inconsistency in maximum residential density?
2. Has the project team explored alternative zoning or land use scenarios to address this issue?
3. Are there any legal or regulatory implications associated with the inconsistency in density criteria?
4. How does the impact of inconsistent density affect neighboring properties or communities?
5. Is there a threshold or benchmark for what constitutes “significant” impact in this context?
6. Have other similar projects faced similar challenges related to residential density?
7. What data or studies were used to determine that no feasible mitigation measures exist?
8. Are there any precedents where projects with similar density issues were successfully resolved?
9. How does the inconsistency impact the overall project timeline and budget?
10. What steps can be taken to minimize the unavoidable impact while adhering to density criteria?

#### Section 5.9.6

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



1. What specific criteria define the “Mixed Use-Urban” designation in the proposed General Plan?
2. How was the consistency with surrounding development assessed, and what metrics were used?
3. Are there any specific commercial or residential properties adjacent to the project site?
4. What benefits are expected from the proposed transition between commercial and single-family residential uses?
5. Has there been community input or feedback regarding this zoning designation?
6. Are there any potential challenges or conflicts related to the Mixed Use-Urban zoning?
7. How does this designation align with long-term urban planning goals for the area?
8. Is there a timeline for implementing this zoning change?
9. What studies or data support the assertion of consistency with surrounding development?
10. Are there any specific design guidelines or restrictions associated with Mixed Use-Urban zones?

#### Section 5.11.2.4

Objective LU-22: Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port Airport, Riverside, Municipal Airport, and Flabob Airports. Policy LU-22.2: Work cooperatively with the Riverside County Airport Land Use Commission in developing, defining, implementing and protecting airport influence zones around the March Air Reserve Base/Inland Port Airport, Riverside Municipal Airport, and Flabob Airport, and in implementing the new Airport Land Use Compatibility Plan

1. What specific criteria define the “March Air Reserve Base/Inland Port Airport influence zones”?
2. How does the new Airport Land Use Compatibility Plan address potential impacts on the long-term viability of the base and surrounding airports?
3. Are there any existing land use or transportation decisions that have raised concerns about viability?
4. What role does the Riverside County Airport Land Use Commission play in defining and implementing these influence zones?
5. How are the interests of both the March Air Reserve Base and the surrounding airports balanced in this process?
6. Have there been any past instances where land use decisions adversely affected the base or nearby airports?

7. What studies or assessments inform the policies outlined in Objective LU-22?
8. Are there specific measures in place to protect against incompatible development near the airports?
9. How does the cooperation between the developer and the Airport Land Use Commission occur practically?
10. Is there a timeline for implementing the new Airport Land Use Compatibility Plan?

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

1. What are the benefits of mixing land uses in urban planning?<sup>1</sup>
2. How does compact building design contribute to smart growth?<sup>1</sup>
3. Why is preserving open space important for smart growth?<sup>1</sup>
4. How does mixed land use enhance community vitality and security?<sup>1</sup>
5. What economic advantages can be gained by siting commercial areas close to residential neighborhoods?<sup>1</sup>
6. How does smart growth support diverse housing options?<sup>2</sup>
7. What role does walkability play in creating smart growth neighborhoods?<sup>2</sup>
8. How can communities encourage more efficient use of land and resources in building design?<sup>1</sup>
9. Why is density important for viable public transit networks?<sup>1</sup>
10. What environmental benefits are associated with compact building design?

#### Section 5.11.2.4

1. Mix land uses. 2. Take advantage of compact building design. 3. Create a range of housing opportunities and choices. 4. Create walkable neighborhoods. 5. Foster distinctive, attractive communities with a strong sense of place. 6. Preserve open space, farmland, natural beauty and critical environmental areas. 7. Strengthen and direct development toward existing communities. 7. Strengthen and direct development toward existing communities. 9. Make development decisions predictable, fair and cost effective. 10. Encourage community and stakeholder collaboration in development decisions.

1. How do you plan to integrate mixed-use development into your project, and what specific combinations of residential, commercial, and recreational spaces are you considering?

2. Can you elaborate on your strategies for compact building design? How will you balance density with quality of life for residents?
3. What range of housing types and price points are you including in your development to ensure diverse housing opportunities?
4. What specific features are you incorporating to enhance walkability, such as pedestrian infrastructure, traffic calming measures, or strategic placement of amenities?
5. How will you incorporate local cultural or historical elements into your design to create a strong sense of place unique to this community?
6. What measures are you taking to preserve or enhance natural areas within or adjacent to your development? How will you balance development needs with environmental conservation?
7. In what ways does your project support or revitalize existing communities nearby? Are you considering any brownfield redevelopment opportunities?
8. How are you working with local authorities to streamline the development process while ensuring it remains fair and transparent?
9. What methods are you using to engage the community and incorporate stakeholder feedback throughout the planning and development process?
10. How does your project address sustainability concerns, such as energy efficiency, water conservation, or resilience to climate change impacts?

#### Section 5.11.6

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

1. How does your project align with the specific land use designations outlined in the City of Riverside General Plan 2025?
2. Are there any aspects of your project that require variances or amendments to existing zoning ordinances? If so, what are they and how do you justify these changes?
3. How does your development plan address any environmental protection policies specified in the General Plan, particularly those aimed at avoiding or mitigating environmental effects?

4. Can you provide a detailed analysis of how your project complies with or enhances the goals set forth in any applicable specific plans for the area?
5. Are there any local coastal program requirements that apply to your project site? If so, how does your plan adhere to these regulations?
6. How does your project contribute to or align with the City's long-term vision for sustainable development as outlined in the General Plan?
7. Are there any potential conflicts between your proposed development and the City's policies on preserving open spaces or environmentally sensitive areas?
8. How does your project address any applicable policies related to traffic management, public transportation, or alternative transportation methods as outlined in the General Plan?
9. Can you explain how your development plan considers and incorporates any relevant historical or cultural preservation policies that may apply to the project area?
10. Are there any specific environmental mitigation measures required by local regulations that you've incorporated into your project design? How do these measures go beyond minimum compliance?

#### Section 6.1

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

1. How does the density of your proposed project compare specifically to the Mission Grove Park apartments and Estancia developments mentioned in the EIR?
2. What measures are you taking to ensure compatibility with the adjacent Mission Villas condominium complex across Alessandro Boulevard?

3. Given that your project is an infill development in a largely built-out area, how are you addressing potential impacts on existing infrastructure and services?
4. Can you provide more details on how your project design considers its proximity to Runway 14-32 and any associated noise or safety concerns?
5. How does your project contribute to the City's goals for infill development, and what specific benefits does it bring to the area?
6. Are there any unique features or amenities in your project that differentiate it from other multi-family developments in Zone C2?
7. How have you addressed potential concerns about increased traffic or parking demands in this already developed area?
8. Given the project's location in Zone C2 near MARB/IPA operations, what specific design elements or operational procedures are you implementing to ensure compatibility with airport activities?
9. How does your project balance the need for housing with the preservation of any existing commercial uses in the area?
10. Can you elaborate on any sustainable or green building practices you're incorporating into this infill development, considering its urban context?

## Section 6.1

Therefore, the Project will not affect the orderly expansion of the MARB/IPA. A City Council proposed overrule of an ALUC action must provide a copy of the proposed decision and findings to both ALUC and the California Division of Aeronautics, a minimum of 45 days prior to decision to overrule ALUC. These agencies have 30 days in which to provide comments to City Council.

1. Can you elaborate on the specific reasons why your project will not affect the orderly expansion of the MARB/IPA (March Air Reserve Base/Inland Port Airport)?
2. Have you had any preliminary discussions with the Airport Land Use Commission (ALUC) regarding your project? If so, what feedback have you received?
3. What specific aspects of your project design or operations ensure compatibility with MARB/IPA activities?
4. Are there any modifications you're willing to make to your project to address potential ALUC concerns and avoid the need for a City Council overrule?
5. How does your project align with the current Airport Land Use Compatibility Plan for MARB/IPA?
6. Have you conducted any noise or safety studies related to the project's proximity to MARB/IPA? If so, what were the findings?

7. What is your contingency plan if the California Division of Aeronautics provides comments that are not in favor of your project?
8. How do you plan to address any potential concerns from current residents about increased development near MARB/IPA?
9. Are there any height restrictions or other development limitations due to the project's location relative to MARB/IPA, and how have you accommodated these in your design?
10. Have you considered any potential future expansion plans of MARB/IPA in your project design? If so, how?

## Section 6.2

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

1. Can you provide a detailed explanation of the specific conditions recommended by the ALUC Staff Report for your project?
2. How exactly do you plan to implement these recommended conditions, and what impact will they have on your original project design?
3. Given that these conditions won't make the project fully consistent with the MARB/IPA LUCP Compatibility Zone C2 density criteria, what additional measures are you considering to further mitigate potential risks?
4. How do you justify proceeding with the project despite the ALUC's assessment of a "significant and unavoidable impact"?
5. Can you elaborate on the specific ways your project exceeds the density compatibility criteria for Zone C2, and why you believe this higher density is necessary or beneficial?
6. What specific design features or operational procedures are you incorporating to "reduce the potential hazards from flight accidents to the greatest extent feasible"?
7. Have you conducted any independent risk assessments or safety studies to complement the ALUC's findings? If so, what were the results?
8. How do you plan to communicate the potential risks and mitigation measures to future residents or users of your development?

9. Are there any innovative or unconventional approaches you're considering to address the density compatibility issues while still meeting your project goals?
10. Given the ALUC's concerns, have you explored alternative locations for this project that might be more compatible with the LUCP criteria? If so, why were they deemed less suitable?

#### Section 5.14.6

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

1. How does your project's proposed population density compare to the current population projections for this area in the city's general plan or other planning documents?
2. Can you provide specific data on the number of new residents your project is expected to bring to the area, and how this compares to the area's current population?
3. What analysis have you conducted to determine the impact of your project on local infrastructure, such as water supply, sewage systems, and electrical grid capacity?
4. How does your project align with or deviate from any existing neighborhood or community plans for this area?
5. Are there any aspects of your project that might indirectly encourage further development or population growth in the surrounding area? If so, how do you plan to address this?
6. What measures are you taking to ensure that local services (such as schools, healthcare facilities, and emergency services) can accommodate the potential population increase?
7. How does your project contribute to or impact the jobs-housing balance in the area? Are you proposing any commercial or business spaces along with residential units?
8. Have you conducted any studies on the potential impact of your project on local traffic patterns and public transportation needs? If so, what were the findings?
9. Are there any features of your project designed to mitigate potential negative impacts of population growth, such as green spaces, community facilities, or sustainability measures?
10. How does your project address affordable housing needs, if at all, and how might this impact population demographics in the area?

#### Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491)Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040

1. How does your project's projected population contribution align with the city's anticipated growth of 58,445 people from 2020 to 2040?
2. Can you provide specific details on how your project will utilize or impact the existing services, access, and infrastructure that were planned for in the General Plan 2025?
3. Have you conducted any studies to determine if the current infrastructure capacity can adequately support your project, or will upgrades be necessary?
4. How does your project contribute to or align with the goals set forth in the 6th Cycle Housing Element?
5. Are there any aspects of your development that go beyond what was anticipated in the General Plan 2025? If so, how do you plan to address potential discrepancies?
6. Can you explain how your project might impact the city's ability to accommodate future growth beyond 2040?
7. What measures are you taking to ensure that your project doesn't strain existing services or infrastructure beyond what was planned for in the General Plan 2025?
8. How does your project contribute to a balanced distribution of population growth across the city, as envisioned in the General Plan?
9. Are there any innovative features in your project that could help the city better manage population growth or improve service delivery?
10. Given the projected population growth, how does your project address potential concerns about increased density, such as traffic congestion or loss of open space?

#### Section 5.16.4

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



square feet of required usable open space. The common open space provided totals 28,611 square feet or 0.66 acres.

1. Can you explain in detail why you are proposing to reduce the required common usable open space from 150 to 75 square feet per unit?
2. How do you justify that 75 square feet of open space per unit is sufficient for the residents' needs and quality of life?
3. What specific amenities or features are you planning to include in the 28,611 square feet of common open space to maximize its usability and value to residents?
4. How does your proposed open space allocation compare to similar projects in the area or other Mixed-Use – Urban developments in the city?
5. Have you conducted any studies or surveys to assess resident preferences or needs regarding open space in high-density urban environments?
6. How will the reduction in open space impact the overall environmental quality of the project, including aspects like heat island effect, stormwater management, and biodiversity?
7. Are you proposing any innovative design solutions to compensate for the reduced open space, such as vertical gardens, rooftop spaces, or other alternatives?
8. How does your proposed open space allocation align with the city's broader goals for green space and livability in urban areas?
9. What measures are you taking to ensure that the reduced open space doesn't negatively impact the mental and physical well-being of residents?
10. If the Specific Plan Amendment is not approved, how would you modify your project to meet the current requirement of 150 square feet of open space per unit?

#### Alternative Uses - Section 7.0.4

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

1. How did you determine that 58 dwelling units would be an appropriate number for this reduced density alternative?
2. How does this reduced density alternative impact the project's ability to meet local housing needs and goals?

3. Can you provide a comparison of the environmental impacts (e.g., traffic, noise, air quality) between the proposed 347-unit project and this 58-unit alternative?
4. How would the reduced density affect the economic feasibility of the project? Are there significant changes to the cost-benefit ratio?
5. Would the reduced density allow for any additional amenities or open space that aren't possible in the higher-density proposal?
6. How does this alternative align with local zoning and land use designations? Would it still require any variances or amendments?
7. Can you explain how this reduced density alternative would impact the project's contribution to the City's Climate Action Plan goals?
8. How would the architectural design and overall site layout change with this reduced density? Would it still maintain the same general character as the proposed project?
9. Would this alternative still be considered an efficient use of infill development, given the significant reduction in units?
10. How does this reduced density alternative impact the project's ability to provide affordable housing units, if any were planned in the original proposal?

#### Alternative Uses - Section 7.0.5

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

1. How does the potential economic impact of a full-scale retail development compare to the proposed residential project in terms of job creation and local tax revenue?
2. What types of minor improvements are being considered for the existing building and parking lot, and how would these impact the overall environmental footprint of the site?
3. How does this retail alternative align with current market demands and trends in the area? Is there a demonstrated need for additional retail space?
4. Can you provide a comparative analysis of the traffic impacts between this retail alternative and the proposed residential project?
5. How would retaining the existing building affect the site's ability to incorporate modern sustainability features or meet current energy efficiency standards?

6. Does this alternative align with the City's long-term vision for land use in this area, particularly given the trend towards mixed-use developments?
7. How would this retail alternative impact the local housing supply and the City's ability to meet its housing goals?
8. What would be the comparative impact on local services (e.g., schools, emergency services) between this retail alternative and the proposed residential project?
9. How does this alternative address or fail to address any identified community needs or preferences that were factored into the original project proposal?
10. Given that this alternative retains the existing structure, how does it compare to the proposed project in terms of potential impacts on local character and aesthetics?

#### Alternative Uses - Section 7.0.6

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

1. Why was no specific off-site location considered for the proposed 347 residential apartment project?
2. How was the size of the potential off-site location determined for this project?
3. Can you provide more details on the process used to identify vacant or underutilized buildings within the City of Riverside?
4. What criteria were used to determine if a building or site was considered "underutilized" for this project?
5. How does the developer plan to address any potential environmental concerns related to the redevelopment of vacant or underutilized buildings?
6. What is the estimated timeline for the identification and acquisition of a suitable off-site location for this project?
7. How will the developer engage with the local community to gather input and address concerns related to the proposed off-site location?
8. Are there any zoning or land use restrictions that could impact the selection of a potential off-site location for this project?

9. What are the potential impacts on traffic and transportation infrastructure in the surrounding area if the project is developed at an off-site location?
10. How will the developer ensure that the proposed off-site location is consistent with the City of Riverside's long-term planning and development goals?

### Section 1.3

The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

1. How will the proposed apartment project integrate with the existing retail environment in terms of design and aesthetics?
2. What specific pedestrian connectivity features will be included in the project design to enhance walkability?
3. How will the project ensure adequate shared parking for both residential and retail uses?
4. What measures will be taken to minimize potential conflicts between pedestrians and vehicles in the project area?
5. How will the project contribute to the overall vitality and economic growth of the surrounding retail environment?
6. Will the project include any ground-floor retail or commercial uses to complement the existing retail environment?
7. How will the project address any potential noise or privacy concerns for residents living in close proximity to retail uses?
8. What strategies will be employed to ensure the safety and security of both residents and retail patrons within the project area?
9. How will the project incorporate sustainable design elements to promote environmental stewardship and reduce its carbon footprint?
10. Will the project include any public or open space amenities for use by both residents and the broader community?

### Section 1.5

The city received only one comment letter in response to the NOP and no comments during the virtual scoping meeting.

1. How did the city ensure that adequate notice was provided to potentially interested parties regarding the NOP and virtual scoping meeting?

2. What outreach efforts were made to engage potentially affected communities and stakeholders in the environmental review process?
3. How will the developer address potential concerns or issues that may arise during the environmental review process, given the limited public input received thus far?
4. Are there any specific environmental or community impacts that the developer anticipates will be raised during the environmental review process?
5. How will the developer ensure that the project is designed and constructed in a manner that minimizes potential environmental impacts?
6. Will the developer consider conducting additional outreach or engagement efforts to solicit input from potentially affected communities and stakeholders as the project moves forward?
7. How will the developer address any potential conflicts between the proposed project and existing land uses or community plans in the surrounding area?
8. Are there any unique or sensitive environmental features in the project area that will require special consideration or mitigation measures during project design and construction?
9. How will the developer ensure that the project complies with all applicable environmental regulations and permitting requirements?
10. Will the developer provide regular updates to the community and stakeholders regarding the progress of the environmental review process and opportunities for public input?

## Section 1.6

This type of EIR should focus primarily on the changes in the environment that would result from the development project.

1. Can you provide a detailed description of the project's impact on local wildlife habitats and any mitigation measures planned?
2. How will the development affect the air quality in the surrounding area during and after construction?
3. What measures are being taken to manage and mitigate noise pollution resulting from the project?
4. How will the project impact local water resources, including both surface water and groundwater?
5. Are there any anticipated effects on the soil stability and erosion in the area due to the development?
6. How does the project plan to address and manage waste generated during construction and operational phases?
7. What is the expected impact on the local vegetation, and are there any plans for reforestation or other compensatory planting?
8. How will the project affect the local climate or microclimate, if at all?

9. Are there any cultural or historical sites within the project area that might be impacted, and how will these be protected?
10. What steps are being taken to ensure that the development is sustainable and minimizes its carbon footprint?

### Section 2.3

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

1. What methods were used to notify residents about the virtual EIR Public Scoping Meeting?
2. Were there any follow-up communications to remind residents about the meeting?
3. Can you provide a breakdown of the attendance numbers and demographics for the meeting?
4. How were the meeting details (date, time, platform) communicated to the public?
5. Were any alternative methods of participation offered for those who could not attend the virtual meeting?
6. How was feedback from the meeting documented and will it be made available to the public?
7. Were there any technical issues reported by attendees during the virtual meeting, and how were they addressed?
8. How was the effectiveness of the meeting communication strategy evaluated?
9. Were residents provided with materials or information in advance of the meeting to prepare them for the discussion?
10. Are there plans for additional public meetings or other forms of community engagement as the project progresses?

### Section 3.2

Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

1. What are the specific boundaries of the project site within the Mission Grove Specific Plan area?
2. How does the project align with the goals and objectives of the Retail Business & Office designation?

3. What types of businesses or offices are anticipated to be included in the project?
4. What is the projected timeline for the development of the project site?
5. How will the project impact the existing infrastructure and public services in the area?
6. Are there any planned improvements to transportation or pedestrian access within the project site?
7. What measures will be taken to mitigate any potential environmental impacts of the project?
8. How will the project contribute to the local economy and job market?
9. What community amenities or public spaces are included in the project plan?
10. How will the project address sustainability and incorporate green building practices?

### Section 3.3.5

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

1. Can you provide the market data that was used to determine the mix of unit sizes for the proposed project?
2. How has the demand for different unit sizes changed post-COVID, and how does this affect the proposed unit mix?
3. What considerations were made regarding the location of the residential units within a shopping center?
4. How will the project address potential concerns from tenants about living in a shopping center environment?
5. What amenities and services will be provided to make the residential units more attractive to potential tenants?
6. How will parking be managed for the 829 tenants, and are there plans for dedicated residential parking?
7. What measures are being taken to ensure privacy and security for residents living in a shopping center?
8. How does the project plan to integrate residential and commercial spaces to create a balanced and cohesive community?
9. Are there any plans to conduct updated market research to validate the proposed unit mix?
10. What is the projected occupancy rate for the different unit types, and what strategies will be used to achieve these rates?

### Section 3.3.5

Parking- The Project includes 604 parking spaces in total. Of these, 513 parking spaces will be dedicated for the Proposed apartment project, and 91 will be shared between the Proposed apartment project and the existing adjacent retail site. The shared parking will be memorialized in a new covenant and restriction agreement between the residential developer entity and Mission Grove Plaza. 58 spaces are Tandem.

1. Can you provide the rationale behind the decision to include 58 tandem parking spaces, and how will these be allocated among tenants?
2. What data supports the need for 513 parking spaces within the project and the additional 91 shared spaces with the shopping center?
3. How will the shared parking agreement with Mission Grove Plaza be enforced to ensure availability for both residential and retail users?
4. What measures are being taken to discourage tenants from opting out of paying for parking and using the shopping center's parking instead?
5. How will the project address potential overflow parking issues that may arise due to the limited parking spaces?
6. Are there any plans to improve the reliability and usage of the transit corridor to reduce dependence on auto transportation?
7. What alternatives to traditional parking are being considered to accommodate tenants who may not own a vehicle?
8. How will the project ensure that the parking provided is sufficient for the needs of all tenants, especially in an area not conducive to people without auto transportation?
9. What impact analysis has been conducted to understand the effect of limited parking on both the residential project and the adjacent retail site?
10. Are there any plans to conduct a parking utilization study post-occupancy to assess the adequacy of the parking provisions and make adjustments if necessary?

### Section 3.4

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



- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.

1. Can you provide specific data or studies that support the projected future housing demand and how it relates to high-density urban apartments in this suburban neighborhood?
2. What criteria were used to determine that this location is suitable for high-density residential development and not for continued commercial use?
3. How does the proposed development align with the City's Housing Element goals, and what specific targets does it aim to meet?
4. Can you provide more details on the green building practices and sustainable development methods that will be implemented in this project?
5. What measures will be taken to ensure that the mixed-use environment encourages walkability and integrates seamlessly with the existing community?
6. How will the project address concerns about the loss of commercial space and its impact on future commercial growth in the area?
7. What specific amenities and transit corridors are in close proximity to the proposed development, and how will they benefit the residents?
8. Can you provide examples of enhanced residential architecture and design elements that will be used to ensure compatibility with the surrounding residential environment?
9. What are the projected economic impacts of replacing commercial property with residential units on the local economy and job market?

10. How will the project contribute to the City's Climate Action Plan, and what measurable outcomes are expected in terms of sustainability and environmental impact?

**Summary**

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

Thank you for your consideration of this letter.

Sincerely,

Lewis Allen  
232 Bathurst Road  
Riverside, CA 92506  
Mission Grove Neighborhood Alliance

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----- Forwarded Message -----

**From:** Brian Kerr <brian@sunward.com>

**To:** Lewis Allen <ljmallen@aol.com>

**Sent:** Monday, June 24, 2024 at 01:01:40 PM PDT

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

230 Questions for you, and I have another 230 different questions.

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

[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)

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

Dear Ms. Hernandez:

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

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

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

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

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

#### Section 5.9.6

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

1. What specific factors contribute to the inconsistency in maximum residential density?
2. Has the project team explored alternative zoning or land use scenarios to address this issue?
3. Are there any legal or regulatory implications associated with the inconsistency in density criteria?

4. How does the impact of inconsistent density affect neighboring properties or communities?
5. Is there a threshold or benchmark for what constitutes “significant” impact in this context?
6. Have other similar projects faced similar challenges related to residential density?
7. What data or studies were used to determine that no feasible mitigation measures exist?
8. Are there any precedents where projects with similar density issues were successfully resolved?
9. How does the inconsistency impact the overall project timeline and budget?
10. What steps can be taken to minimize the unavoidable impact while adhering to density criteria?

#### Section 5.9.6

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

1. What specific criteria define the “Mixed Use-Urban” designation in the proposed General Plan?
2. How was the consistency with surrounding development assessed, and what metrics were used?
3. Are there any specific commercial or residential properties adjacent to the project site?
4. What benefits are expected from the proposed transition between commercial and single-family residential uses?
5. Has there been community input or feedback regarding this zoning designation?
6. Are there any potential challenges or conflicts related to the Mixed Use-Urban zoning?
7. How does this designation align with long-term urban planning goals for the area?
8. Is there a timeline for implementing this zoning change?
9. What studies or data support the assertion of consistency with surrounding development?
10. Are there any specific design guidelines or restrictions associated with Mixed Use-Urban zones?

#### Section 5.11.2.4

Objective LU-22: Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port Airport, Riverside, Municipal Airport, and Flabob Airports. Policy LU-22.2: Work cooperatively with the Riverside County Airport Land Use Commission in developing, defining, implementing and protecting airport influence zones around the March Air Reserve

Base/Inland Port Airport, Riverside Municipal Airport, and Flabob Airport, and in implementing the new Airport Land Use Compatibility Plan

1. What specific criteria define the “March Air Reserve Base/Inland Port Airport influence zones”?
2. How does the new Airport Land Use Compatibility Plan address potential impacts on the long-term viability of the base and surrounding airports?
3. Are there any existing land use or transportation decisions that have raised concerns about viability?
4. What role does the Riverside County Airport Land Use Commission play in defining and implementing these influence zones?
5. How are the interests of both the March Air Reserve Base and the surrounding airports balanced in this process?
6. Have there been any past instances where land use decisions adversely affected the base or nearby airports?
7. What studies or assessments inform the policies outlined in Objective LU-22?
8. Are there specific measures in place to protect against incompatible development near the airports?
9. How does the cooperation between the developer and the Airport Land Use Commission occur practically?
10. Is there a timeline for implementing the new Airport Land Use Compatibility Plan?

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

1. What are the benefits of mixing land uses in urban planning?<sup>1</sup>
2. How does compact building design contribute to smart growth?<sup>1</sup>
3. Why is preserving open space important for smart growth?<sup>1</sup>
4. How does mixed land use enhance community vitality and security?<sup>1</sup>
5. What economic advantages can be gained by siting commercial areas close to residential neighborhoods?<sup>1</sup>
6. How does smart growth support diverse housing options?<sup>2</sup>
7. What role does walkability play in creating smart growth neighborhoods?<sup>2</sup>
8. How can communities encourage more efficient use of land and resources in building design?<sup>1</sup>
9. Why is density important for viable public transit networks?<sup>1</sup>
10. What environmental benefits are associated with compact building design?

Section 5.11.2.4

1. Mix land uses.2. Take advantage of compact building design.3. Create a range of housing opportunities and choices.4. Create walkable neighborhoods.5. Foster distinctive, attractive communities with a strong sense of place.6. Preserve open space, farmland, natural beauty and critical environmental areas.7. Strengthen and direct development toward existing communities.7. Strengthen and direct development toward existing communities.9. Make development decisions predictable, fair and cost effective.10. Encourage community and stakeholder collaboration in development decisions.

1. How do you plan to integrate mixed-use development into your project, and what specific combinations of residential, commercial, and recreational spaces are you considering?
2. Can you elaborate on your strategies for compact building design? How will you balance density with quality of life for residents?
3. What range of housing types and price points are you including in your development to ensure diverse housing opportunities?
4. What specific features are you incorporating to enhance walkability, such as pedestrian infrastructure, traffic calming measures, or strategic placement of amenities?
5. How will you incorporate local cultural or historical elements into your design to create a strong sense of place unique to this community?
6. What measures are you taking to preserve or enhance natural areas within or adjacent to your development? How will you balance development needs with environmental conservation?
7. In what ways does your project support or revitalize existing communities nearby? Are you considering any brownfield redevelopment opportunities?
8. How are you working with local authorities to streamline the development process while ensuring it remains fair and transparent?
9. What methods are you using to engage the community and incorporate stakeholder feedback throughout the planning and development process?
10. How does your project address sustainability concerns, such as energy efficiency, water conservation, or resilience to climate change impacts?

#### Section 5.11.6

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

1. How does your project align with the specific land use designations outlined in the City of Riverside General Plan 2025?

2. Are there any aspects of your project that require variances or amendments to existing zoning ordinances? If so, what are they and how do you justify these changes?
3. How does your development plan address any environmental protection policies specified in the General Plan, particularly those aimed at avoiding or mitigating environmental effects?
4. Can you provide a detailed analysis of how your project complies with or enhances the goals set forth in any applicable specific plans for the area?
5. Are there any local coastal program requirements that apply to your project site? If so, how does your plan adhere to these regulations?
6. How does your project contribute to or align with the City's long-term vision for sustainable development as outlined in the General Plan?
7. Are there any potential conflicts between your proposed development and the City's policies on preserving open spaces or environmentally sensitive areas?
8. How does your project address any applicable policies related to traffic management, public transportation, or alternative transportation methods as outlined in the General Plan?
9. Can you explain how your development plan considers and incorporates any relevant historical or cultural preservation policies that may apply to the project area?
10. Are there any specific environmental mitigation measures required by local regulations that you've incorporated into your project design? How do these measures go beyond minimum compliance?

## Section 6.1

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

1. How does the density of your proposed project compare specifically to the Mission Grove Park apartments and Estancia developments mentioned in the EIR?

2. What measures are you taking to ensure compatibility with the adjacent Mission Villas condominium complex across Alessandro Boulevard?
3. Given that your project is an infill development in a largely built-out area, how are you addressing potential impacts on existing infrastructure and services?
4. Can you provide more details on how your project design considers its proximity to Runway 14-32 and any associated noise or safety concerns?
5. How does your project contribute to the City's goals for infill development, and what specific benefits does it bring to the area?
6. Are there any unique features or amenities in your project that differentiate it from other multi-family developments in Zone C2?
7. How have you addressed potential concerns about increased traffic or parking demands in this already developed area?
8. Given the project's location in Zone C2 near MARB/IPA operations, what specific design elements or operational procedures are you implementing to ensure compatibility with airport activities?
9. How does your project balance the need for housing with the preservation of any existing commercial uses in the area?
10. Can you elaborate on any sustainable or green building practices you're incorporating into this infill development, considering its urban context?

## Section 6.1

Therefore, the Project will not affect the orderly expansion of the MARB/IPA. A City Council proposed overrule of an ALUC action must provide a copy of the proposed decision and findings to both ALUC and the California Division of Aeronautics, a minimum of 45 days prior to decision to overrule ALUC. These agencies have 30 days in which to provide comments to City Council.

1. Can you elaborate on the specific reasons why your project will not affect the orderly expansion of the MARB/IPA (March Air Reserve Base/Inland Port Airport)?
2. Have you had any preliminary discussions with the Airport Land Use Commission (ALUC) regarding your project? If so, what feedback have you received?
3. What specific aspects of your project design or operations ensure compatibility with MARB/IPA activities?
4. Are there any modifications you're willing to make to your project to address potential ALUC concerns and avoid the need for a City Council overrule?
5. How does your project align with the current Airport Land Use Compatibility Plan for MARB/IPA?
6. Have you conducted any noise or safety studies related to the project's proximity to MARB/IPA? If so, what were the findings?
7. What is your contingency plan if the California Division of Aeronautics provides comments that are not in favor of your project?



8. How do you plan to address any potential concerns from current residents about increased development near MARB/IPA?
9. Are there any height restrictions or other development limitations due to the project's location relative to MARB/IPA, and how have you accommodated these in your design?
10. Have you considered any potential future expansion plans of MARB/IPA in your project design? If so, how?

## Section 6.2

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

1. Can you provide a detailed explanation of the specific conditions recommended by the ALUC Staff Report for your project?
2. How exactly do you plan to implement these recommended conditions, and what impact will they have on your original project design?
3. Given that these conditions won't make the project fully consistent with the MARB/IPA LUCP Compatibility Zone C2 density criteria, what additional measures are you considering to further mitigate potential risks?
4. How do you justify proceeding with the project despite the ALUC's assessment of a "significant and unavoidable impact"?
5. Can you elaborate on the specific ways your project exceeds the density compatibility criteria for Zone C2, and why you believe this higher density is necessary or beneficial?
6. What specific design features or operational procedures are you incorporating to "reduce the potential hazards from flight accidents to the greatest extent feasible"?
7. Have you conducted any independent risk assessments or safety studies to complement the ALUC's findings? If so, what were the results?
8. How do you plan to communicate the potential risks and mitigation measures to future residents or users of your development?
9. Are there any innovative or unconventional approaches you're considering to address the density compatibility issues while still meeting your project goals?
10. Given the ALUC's concerns, have you explored alternative locations for this project that might be more compatible with the LUCP criteria? If so, why were they deemed less suitable?

## Section 5.14.6

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

1. How does your project's proposed population density compare to the current population projections for this area in the city's general plan or other planning documents?
2. Can you provide specific data on the number of new residents your project is expected to bring to the area, and how this compares to the area's current population?
3. What analysis have you conducted to determine the impact of your project on local infrastructure, such as water supply, sewage systems, and electrical grid capacity?
4. How does your project align with or deviate from any existing neighborhood or community plans for this area?
5. Are there any aspects of your project that might indirectly encourage further development or population growth in the surrounding area? If so, how do you plan to address this?
6. What measures are you taking to ensure that local services (such as schools, healthcare facilities, and emergency services) can accommodate the potential population increase?
7. How does your project contribute to or impact the jobs-housing balance in the area? Are you proposing any commercial or business spaces along with residential units?
8. Have you conducted any studies on the potential impact of your project on local traffic patterns and public transportation needs? If so, what were the findings?
9. Are there any features of your project designed to mitigate potential negative impacts of population growth, such as green spaces, community facilities, or sustainability measures?
10. How does your project address affordable housing needs, if at all, and how might this impact population demographics in the area?

## Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491) Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040

1. How does your project's projected population contribution align with the city's anticipated growth of 58,445 people from 2020 to 2040?
2. Can you provide specific details on how your project will utilize or impact the existing services, access, and infrastructure that were planned for in the General Plan 2025?
3. Have you conducted any studies to determine if the current infrastructure capacity can adequately support your project, or will upgrades be necessary?
4. How does your project contribute to or align with the goals set forth in the 6th Cycle Housing Element?
5. Are there any aspects of your development that go beyond what was anticipated in the General Plan 2025? If so, how do you plan to address potential discrepancies?
6. Can you explain how your project might impact the city's ability to accommodate future growth beyond 2040?
7. What measures are you taking to ensure that your project doesn't strain existing services or infrastructure beyond what was planned for in the General Plan 2025?
8. How does your project contribute to a balanced distribution of population growth across the city, as envisioned in the General Plan?
9. Are there any innovative features in your project that could help the city better manage population growth or improve service delivery?
10. Given the projected population growth, how does your project address potential concerns about increased density, such as traffic congestion or loss of open space?

#### Section 5.16.4

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

1. Can you explain in detail why you are proposing to reduce the required common usable open space from 150 to 75 square feet per unit?
2. How do you justify that 75 square feet of open space per unit is sufficient for the residents' needs and quality of life?

3. What specific amenities or features are you planning to include in the 28,611 square feet of common open space to maximize its usability and value to residents?
4. How does your proposed open space allocation compare to similar projects in the area or other Mixed-Use – Urban developments in the city?
5. Have you conducted any studies or surveys to assess resident preferences or needs regarding open space in high-density urban environments?
6. How will the reduction in open space impact the overall environmental quality of the project, including aspects like heat island effect, stormwater management, and biodiversity?
7. Are you proposing any innovative design solutions to compensate for the reduced open space, such as vertical gardens, rooftop spaces, or other alternatives?
8. How does your proposed open space allocation align with the city's broader goals for green space and livability in urban areas?
9. What measures are you taking to ensure that the reduced open space doesn't negatively impact the mental and physical well-being of residents?
10. If the Specific Plan Amendment is not approved, how would you modify your project to meet the current requirement of 150 square feet of open space per unit?

#### Alternative Uses - Section 7.0.4

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

1. How did you determine that 58 dwelling units would be an appropriate number for this reduced density alternative?
2. How does this reduced density alternative impact the project's ability to meet local housing needs and goals?
3. Can you provide a comparison of the environmental impacts (e.g., traffic, noise, air quality) between the proposed 347-unit project and this 58-unit alternative?
4. How would the reduced density affect the economic feasibility of the project? Are there significant changes to the cost-benefit ratio?
5. Would the reduced density allow for any additional amenities or open space that aren't possible in the higher-density proposal?
6. How does this alternative align with local zoning and land use designations? Would it still require any variances or amendments?
7. Can you explain how this reduced density alternative would impact the project's contribution to the City's Climate Action Plan goals?

8. How would the architectural design and overall site layout change with this reduced density? Would it still maintain the same general character as the proposed project?
9. Would this alternative still be considered an efficient use of infill development, given the significant reduction in units?
10. How does this reduced density alternative impact the project's ability to provide affordable housing units, if any were planned in the original proposal?

#### Alternative Uses - Section 7.0.5

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

1. How does the potential economic impact of a full-scale retail development compare to the proposed residential project in terms of job creation and local tax revenue?
2. What types of minor improvements are being considered for the existing building and parking lot, and how would these impact the overall environmental footprint of the site?
3. How does this retail alternative align with current market demands and trends in the area? Is there a demonstrated need for additional retail space?
4. Can you provide a comparative analysis of the traffic impacts between this retail alternative and the proposed residential project?
5. How would retaining the existing building affect the site's ability to incorporate modern sustainability features or meet current energy efficiency standards?
6. Does this alternative align with the City's long-term vision for land use in this area, particularly given the trend towards mixed-use developments?
7. How would this retail alternative impact the local housing supply and the City's ability to meet its housing goals?
8. What would be the comparative impact on local services (e.g., schools, emergency services) between this retail alternative and the proposed residential project?
9. How does this alternative address or fail to address any identified community needs or preferences that were factored into the original project proposal?
10. Given that this alternative retains the existing structure, how does it compare to the proposed project in terms of potential impacts on local character and aesthetics?

## Alternative Uses - Section 7.0.6

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

1. Why was no specific off-site location considered for the proposed 347 residential apartment project?
2. How was the size of the potential off-site location determined for this project?
3. Can you provide more details on the process used to identify vacant or underutilized buildings within the City of Riverside?
4. What criteria were used to determine if a building or site was considered "underutilized" for this project?
5. How does the developer plan to address any potential environmental concerns related to the redevelopment of vacant or underutilized buildings?
6. What is the estimated timeline for the identification and acquisition of a suitable off-site location for this project?
7. How will the developer engage with the local community to gather input and address concerns related to the proposed off-site location?
8. Are there any zoning or land use restrictions that could impact the selection of a potential off-site location for this project?
9. What are the potential impacts on traffic and transportation infrastructure in the surrounding area if the project is developed at an off-site location?
10. How will the developer ensure that the proposed off-site location is consistent with the City of Riverside's long-term planning and development goals?

## Section 1.3

The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

1. How will the proposed apartment project integrate with the existing retail environment in terms of design and aesthetics?
2. What specific pedestrian connectivity features will be included in the project design to enhance walkability?
3. How will the project ensure adequate shared parking for both residential and retail uses?

4. What measures will be taken to minimize potential conflicts between pedestrians and vehicles in the project area?
5. How will the project contribute to the overall vitality and economic growth of the surrounding retail environment?
6. Will the project include any ground-floor retail or commercial uses to complement the existing retail environment?
7. How will the project address any potential noise or privacy concerns for residents living in close proximity to retail uses?
8. What strategies will be employed to ensure the safety and security of both residents and retail patrons within the project area?
9. How will the project incorporate sustainable design elements to promote environmental stewardship and reduce its carbon footprint?
10. Will the project include any public or open space amenities for use by both residents and the broader community?

## Section 1.5

The city received only one comment letter in response to the NOP and no comments during the virtual scoping meeting.

1. How did the city ensure that adequate notice was provided to potentially interested parties regarding the NOP and virtual scoping meeting?
2. What outreach efforts were made to engage potentially affected communities and stakeholders in the environmental review process?
3. How will the developer address potential concerns or issues that may arise during the environmental review process, given the limited public input received thus far?
4. Are there any specific environmental or community impacts that the developer anticipates will be raised during the environmental review process?
5. How will the developer ensure that the project is designed and constructed in a manner that minimizes potential environmental impacts?
6. Will the developer consider conducting additional outreach or engagement efforts to solicit input from potentially affected communities and stakeholders as the project moves forward?
7. How will the developer address any potential conflicts between the proposed project and existing land uses or community plans in the surrounding area?
8. Are there any unique or sensitive environmental features in the project area that will require special consideration or mitigation measures during project design and construction?
9. How will the developer ensure that the project complies with all applicable environmental regulations and permitting requirements?
10. Will the developer provide regular updates to the community and stakeholders regarding the progress of the environmental review process and opportunities for public input?

## Section 1.6

This type of EIR should focus primarily on the changes in the environment that would result from the development project.

1. Can you provide a detailed description of the project's impact on local wildlife habitats and any mitigation measures planned?
2. How will the development affect the air quality in the surrounding area during and after construction?
3. What measures are being taken to manage and mitigate noise pollution resulting from the project?
4. How will the project impact local water resources, including both surface water and groundwater?
5. Are there any anticipated effects on the soil stability and erosion in the area due to the development?
6. How does the project plan to address and manage waste generated during construction and operational phases?
7. What is the expected impact on the local vegetation, and are there any plans for reforestation or other compensatory planting?
8. How will the project affect the local climate or microclimate, if at all?
9. Are there any cultural or historical sites within the project area that might be impacted, and how will these be protected?
10. What steps are being taken to ensure that the development is sustainable and minimizes its carbon footprint?

## Section 2.3

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

1. What methods were used to notify residents about the virtual EIR Public Scoping Meeting?
2. Were there any follow-up communications to remind residents about the meeting?
3. Can you provide a breakdown of the attendance numbers and demographics for the meeting?
4. How were the meeting details (date, time, platform) communicated to the public?
5. Were any alternative methods of participation offered for those who could not attend the virtual meeting?



6. How was feedback from the meeting documented and will it be made available to the public?
7. Were there any technical issues reported by attendees during the virtual meeting, and how were they addressed?
8. How was the effectiveness of the meeting communication strategy evaluated?
9. Were residents provided with materials or information in advance of the meeting to prepare them for the discussion?
10. Are there plans for additional public meetings or other forms of community engagement as the project progresses?

### Section 3.2

Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

1. What are the specific boundaries of the project site within the Mission Grove Specific Plan area?
2. How does the project align with the goals and objectives of the Retail Business & Office designation?
3. What types of businesses or offices are anticipated to be included in the project?
4. What is the projected timeline for the development of the project site?
5. How will the project impact the existing infrastructure and public services in the area?
6. Are there any planned improvements to transportation or pedestrian access within the project site?
7. What measures will be taken to mitigate any potential environmental impacts of the project?
8. How will the project contribute to the local economy and job market?
9. What community amenities or public spaces are included in the project plan?
10. How will the project address sustainability and incorporate green building practices?

### Section 3.3.5

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

1. Can you provide the market data that was used to determine the mix of unit sizes for the proposed project?
2. How has the demand for different unit sizes changed post-COVID, and how does this affect the proposed unit mix?
3. What considerations were made regarding the location of the residential units within a shopping center?
4. How will the project address potential concerns from tenants about living in a shopping center environment?
5. What amenities and services will be provided to make the residential units more attractive to potential tenants?
6. How will parking be managed for the 829 tenants, and are there plans for dedicated residential parking?
7. What measures are being taken to ensure privacy and security for residents living in a shopping center?
8. How does the project plan to integrate residential and commercial spaces to create a balanced and cohesive community?
9. Are there any plans to conduct updated market research to validate the proposed unit mix?
10. What is the projected occupancy rate for the different unit types, and what strategies will be used to achieve these rates?

### Section 3.3.5

Parking- The Project includes 604 parking spaces in total. Of these, 513 parking spaces will be dedicated for the Proposed apartment project, and 91 will be shared between the Proposed apartment project and the existing adjacent retail site. The shared parking will be memorialized in a new covenant and restriction agreement between the residential developer entity and Mission Grove Plaza. 58 spaces are Tandem.

1. Can you provide the rationale behind the decision to include 58 tandem parking spaces, and how will these be allocated among tenants?
2. What data supports the need for 513 parking spaces within the project and the additional 91 shared spaces with the shopping center?
3. How will the shared parking agreement with Mission Grove Plaza be enforced to ensure availability for both residential and retail users?
4. What measures are being taken to discourage tenants from opting out of paying for parking and using the shopping center's parking instead?
5. How will the project address potential overflow parking issues that may arise due to the limited parking spaces?
6. Are there any plans to improve the reliability and usage of the transit corridor to reduce dependence on auto transportation?

7. What alternatives to traditional parking are being considered to accommodate tenants who may not own a vehicle?
8. How will the project ensure that the parking provided is sufficient for the needs of all tenants, especially in an area not conducive to people without auto transportation?
9. What impact analysis has been conducted to understand the effect of limited parking on both the residential project and the adjacent retail site?
10. Are there any plans to conduct a parking utilization study post-occupancy to assess the adequacy of the parking provisions and make adjustments if necessary?

### Section 3.4

- Provide a high-quality residential development in close proximity to many existing amenities and transit corridors.
- Increase the type and amount of housing available consistent with the goals of the City's Housing Element.
- Maximize the residential potential of the site to assist the City of Riverside in meeting project housing demand as part of the City's housing needs and growth projections.
- Use land resources more efficiently by providing a well-planned, infill redevelopment on a underutilized vacant site.
- Identify mixed-use development standards in the Specific Plan Amendment to create a framework for cohesive integration of uses.
- In furtherance of the City's Climate Action Plan, replace aging building construction with green building practices and other sustainable development methods.
- Create a mixed-use environment encouraging walkability.
- Provide for enhanced residential architecture and aesthetically coherent design elements that are compatible and complementary with the existing surrounding residential built environment in terms of colors and materials and landscaping.

1. Can you provide specific data or studies that support the projected future housing demand and how it relates to high-density urban apartments in this suburban neighborhood?
2. What criteria were used to determine that this location is suitable for high-density residential development and not for continued commercial use?
3. How does the proposed development align with the City's Housing Element goals, and what specific targets does it aim to meet?
4. Can you provide more details on the green building practices and sustainable development methods that will be implemented in this project?

5. What measures will be taken to ensure that the mixed-use environment encourages walkability and integrates seamlessly with the existing community?
6. How will the project address concerns about the loss of commercial space and its impact on future commercial growth in the area?
7. What specific amenities and transit corridors are in close proximity to the proposed development, and how will they benefit the residents?
8. Can you provide examples of enhanced residential architecture and design elements that will be used to ensure compatibility with the surrounding residential environment?
9. What are the projected economic impacts of replacing commercial property with residential units on the local economy and job market?
10. How will the project contribute to the City's Climate Action Plan, and what measurable outcomes are expected in terms of sustainability and environmental impact?

### **Summary**

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

Thank you for your consideration of this letter.

Sincerely,

Lewis Allen  
232 Bathurst Road  
Riverside, CA 92506  
Email: [LJMAllen@aol.com](mailto:LJMAllen@aol.com)  
Mission Grove Neighborhood Alliance

**From:** Mariah Rojas <mariah22.r@gmail.com>  
**Sent:** Monday, June 24, 2024 10:57 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Dear Ms. Hernandez:

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

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

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

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

More specifically, I would like to comment on the following sections related to the EIR: Section 4.3

Developments Considered in Cumulative Impact Analysis Total of six (6) developments

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

- No other high density projects in the area except the new project at Van Buren and Wood Str.

- Can you provide a detailed analysis of how the proposed high-density residential project will interact with the existing and planned developments in the area, particularly the commercial and warehouse projects mentioned in the cumulative impact analysis?

- What specific measures will be taken to mitigate any potential cumulative impacts on traffic, infrastructure, and public services resulting from the combination of your project and the other developments in the area?

- How does the proposed high-density residential project align with the overall land use and development strategy for the area, given that there are no other high-density projects except the one at Van Buren and Wood Street?

- Have you conducted any studies to assess the potential economic and social impacts of introducing a high-density residential project in an area predominantly characterized by commercial and warehouse developments?

- Can you provide examples of similar areas where high-density residential projects have been successfully integrated with commercial and warehouse developments, and what lessons from those projects will be applied to ensure the success of this proposed development?

## Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

Name, and address

Mission Grove Neighborhood Alliance

Alexis Rojas  
909-228-2401  
mariah19.r@gmail.com  
mariah@scbehaviorconsultants.com

**From:** Marie Moreno Myers <mmmcatchup@gmail.com>  
**Sent:** Sunday, June 23, 2024 3:45 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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2022100610

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

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



## Section 5.14.6

Environmental Impacts before Mitigation - The General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access and infrastructure. (P. 491) Per the 6th Cycle Housing Element Technical Background Report, the City of Riverside had an estimated population of 328,155 in 2020. This represents a growth of 58,445 people from 2020 to 2040.

- There is no evidence to support this statement. The City cannot and does not maintain the current infrastructure and provide adequate services. If the growth rate is estimated to be 3,000 per year from 2020 to 2040, then why the RHNA commitment for 20,000 housing units by 2029.
- Can you provide detailed evidence and data to support the statement that the General Plan 2025 was designed to accommodate anticipated growth by providing adequate services, access, and infrastructure, particularly in light of current infrastructure and service challenges?
- How do you reconcile the estimated annual growth rate of 3,000 people per year from 2020 to 2040 with the RHNA commitment for 20,000 housing units by 2029, and what specific strategies will be implemented to meet this housing target?
- What measures are being taken to ensure that the existing infrastructure and services can be upgraded or expanded to support the projected population growth and the additional housing units required by the RHNA commitment?
- Can you provide a comprehensive analysis of the current state of infrastructure and services in the City of Riverside, including any identified deficiencies, and how these will be addressed to support future growth?
- How will the proposed project contribute to meeting the RHNA commitment, and what specific steps will be taken to ensure that the development aligns with the broader goals and requirements of the General Plan 2025 and the 6th Cycle Housing Element?

### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,  
**Marie Moreno Myers**

7186 Stanhope Lane  
Riverside, CA 92506  
mmmcatchup@gmail.com  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Marie Moreno Myers <mmmcatchup@gmail.com>  
**Sent:** Sunday, June 23, 2024 3:42 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

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

## Section 3.2

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

- No supporting market data that indicates the Land Use, Zoning, General Plan and Specific Plan should be abandoned.
- Can you provide detailed market data and analysis that supports the need for changing the current land use, zoning, General Plan, and Specific Plan designations from Commercial to Mixed Use-Urban?
- What specific factors or trends in the local real estate market indicate that the current commercial designation is no longer viable or appropriate for the project site?
- How does the proposed change in land use and zoning align with the broader goals and objectives of the Mission Grove Specific Plan and the City of Riverside's General Plan?
- Have you conducted any feasibility studies or economic impact assessments to compare the potential benefits and drawbacks of maintaining the site as a commercial retail space versus redeveloping it for mixed-use or residential purposes?
- What community engagement or consultation processes have been undertaken to gather input from local residents and stakeholders regarding the proposed changes, and how have their concerns and suggestions been addressed in the project planning?

## Summary

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

be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets

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

Thank you for your consideration of this letter.

Sincerely,

**Marie Moreno Myers**

7186 Stanhope Lane

Riverside, CA 92506

mmmcatchup@gmail.com

Mission Grove Neighborhood Alliance

**From:** Marie Moreno Myers <mmmcatchup@gmail.com>  
**Sent:** Sunday, June 23, 2024 3:41 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
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RE: Public comment on the record for the Mission Grove Apartments EIR, SCH #  
2022100610

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

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

## Section 3.0

- General Plan Amendment (GPA) – to change the General Plan Land Use Designation from C - Commercial to MU-U - Mixed Use-Urban, to allow residential land use.
- Zoning Code Amendment (RZ) – to change the zoning from CR-SP Commercial Retail and Specific Plan (Mission Grove) Overlay Zones to MU-U-SP – Mixed Use-Urban and Specific Plan (Mission Grove) Overlay Zones.
- Specific Plan Amendment (SPA) – to revise the Mission Grove Specific Plan.
- Tentative Parcel Map (TPM) 38598 – to subdivide the existing Parcel 1 of Parcel Map 26320 into two parcels for financing and conveyance purposes.
- Design Review (DR) – for the proposed site design and building elevations.
- Environmental Impact Report (EIR) – for the preparation of an Environmental Impact Report for the proposed Project.
- Airport Land Use Commission (ALUC) – determination of consistency or inconsistency with applicable airport land use compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP).

● These Actions are a drastic abandonment of the current requirements established years ago to protect the neighborhood and ensure community continuity. No data or research has been provided that shows viable reasons for discarding these effective requirements. The proposed project is for a high density apartment project , not a mixed use building. Mixed use requires 80% of the ground floor to be offered as Commerical, Retail or Office space. This project does not match the zoning change.

● Can you provide detailed data or research that supports the need for changing the General Plan Land Use Designation from Commercial to Mixed Use-Urban, and how this change will benefit the community?

● How does the proposed high-density apartment project align with the requirements for mixed-use zoning, particularly the stipulation that 80% of the ground floor be dedicated to commercial, retail, or office space?

● What specific measures will be taken to ensure that the proposed project does not negatively impact the neighborhood's character and continuity, which were protected by the original zoning requirements?

● Have you conducted any studies or analyses to determine the potential impacts of the proposed zoning changes on local traffic, infrastructure, and public services, and if so, what were the findings?

● How does the proposed project address the compatibility criteria of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, and what steps will be taken to mitigate any identified inconsistencies?

## Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

**Marie Moreno Myers**

7186 Stanhope Lane

Riverside, CA 92506

mmmcatchup@gmail.com

Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Marie Moreno Myers <mmmcatchup@gmail.com>  
**Sent:** Sunday, June 23, 2024 3:41 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

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



Parking- The Project includes 604 parking spaces in total. Of these, 513 parking spaces will be dedicated for the Proposed apartment project, and 91 will be shared between the Proposed apartment project and the existing adjacent retail site. The shared parking will be memorialized in a new covenant and restriction agreement between the residential developer entity and Mission Grove Plaza. 58 spaces are Tandem.

- Only 513 parking spaces within the project and 58 of those are tandem spaces. 91 shared spaces with the shopping center. There is no support for this many parking spaces. The area is not conducive to people without auto transportation. The transit corridor is not reliable and not widely used. There is no support for this limited parking and the tenants can opt out of paying for parking and simply use the shopping center. This is has not been examined adequately.
- Can you provide detailed data or studies that support the adequacy of 513 parking spaces for the proposed apartment project, including the 58 tandem spaces, given the area's reliance on auto transportation and the unreliability of the transit corridor?
- How do you plan to enforce the covenant and restriction agreement to ensure that tenants do not opt out of paying for parking and instead use the shopping center's parking spaces, potentially causing parking shortages for retail customers?
- What measures will be taken to address potential overflow parking issues, particularly during peak shopping hours, given that 91 parking spaces are shared between the residential project and the adjacent retail site?
- Have you conducted any traffic and parking studies to assess the impact of the proposed parking arrangement on the surrounding area, and if so, what were the findings and recommendations?
- Can you provide examples of similar mixed-use developments where a comparable parking strategy has been successfully implemented, and what lessons from those projects will be applied to ensure the success of this proposed parking plan?

## Summary

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

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

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

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

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More specifically, I would like to comment on the following sections related to the EIR: Section 3.2

Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

- No market data has been presented to support changing this area designation to Residential.
- Can you provide comprehensive market data and analysis that justifies changing the area designation from Retail Business & Office to Residential, particularly considering the site's central location within the Specific Plan area?
- How does the proposed residential development align with the original intent and goals of the Mission Grove Specific Plan, and what specific benefits will it bring to the area that the current Retail Business & Office designation does not?
- Have you conducted any studies to assess the potential economic impact of removing retail and office space from this central location, and if so, what were the findings?
- What measures do you propose to ensure that the loss of potential retail and office space in this area won't negatively impact local employment opportunities or the overall economic balance of the Mission Grove area?
- Can you provide examples of similar successful conversions from Retail Business & Office to Residential in comparable specific plan areas, and what lessons from those projects can be applied to ensure the success of this proposed change?

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

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

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

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More specifically, I would like to comment on the following sections related to the EIR: Section 1.6

This type of EIR should focus primarily on the changes in the environment that would result from the development project.

- The report should be unbiased and not show that it is promoting the project in any way. This EIR is a marketing report for the project emphasizing support for the project continually.

- Can you provide specific examples of how the EIR maintains objectivity in its analysis, particularly in sections where potential negative impacts are discussed?

- What measures were taken during the EIR preparation process to ensure an unbiased assessment of environmental impacts, rather than promoting the project?

- How does the EIR balance the presentation of potential benefits and drawbacks of the project, and can you point to specific sections that demonstrate this balance?

- Were any independent third-party reviewers involved in the EIR process to ensure objectivity, and if so, can you share their findings or recommendations?

- Given the concern that the EIR appears to be promoting the project, what steps are you willing to take to address this perception and ensure a more neutral presentation of environmental impacts?

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More specifically, I would like to comment on the following sections related to the EIR: Section 1.5

The city received only one comment letter in response to the NOP and no comments during the virtual scoping meeting.

- Adequate notice was not provided by the City and/or developer. The communication might have met the laws minimum requirements but obviously that is not adequate.
- Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change?
- How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential?
- Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed for car-dependent retail?
- What specific shared elements, including parking, are planned between the residential and retail components, and how will these be implemented without negatively impacting the existing retail operations?
- Given that the project will replace a portion of a commercial facility designed to support the neighborhood, how do you plan to mitigate the potential loss of retail services and ensure that the new development still meets the community's needs?

#### Summary

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More specifically, I would like to comment on the following sections related to the EIR: Section 1.3

The Mixed Use-Urban zone will allow the proposed apartment project to be introduced into the existing retail environment and will create a framework for integration of uses with features such as pedestrian connectivity, walkability, and shared elements including parking.

- This is an unsupported statement that makes unsupported assumptions. This is a proposed apartment building that will replace a large portion of a commercial facility that was designed to support the neighborhood. There is no market data to support this project.
- Can you provide specific market data and analysis that demonstrates the demand for high-density residential units in this primarily retail area, and how this demand justifies the proposed zoning change?
- How do you plan to ensure true integration of uses between the proposed apartment project and the existing retail environment, given that the project appears to be primarily residential?
- Can you provide detailed plans or studies showing how the proposed project will enhance pedestrian connectivity and walkability in an area that was originally designed for car-dependent retail?
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More specifically, I would like to comment on the following sections related to the EIR:



### Alternative Uses - Section 7.0.3

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

- This assumes the property will remain as-is and is only used for temporary retail with no desire for a permanent tenant.
- Have you conducted any market studies or feasibility analyses to determine the potential for attracting permanent retail tenants to the existing site rather than assuming it will only be used for temporary/seasonal retail?
- What specific green building practices and sustainable development methods are you proposing that would significantly contribute to the City's Climate Action Plan goals?
- Can you provide a comparative analysis of how your proposed high-quality housing development would more effectively meet the city's housing needs than other potential uses for the site?
- How does your project's proximity to high-quality transit corridors specifically translate into reduced environmental impacts compared to the No Project alternative?
- Given that the site is described as "underutilized," have you explored any alternative development scenarios that could achieve similar objectives while preserving some existing structures or uses?

### **Summary**

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

Thank you for your consideration of this letter.

Sincerely,

**Marie Moreno Myers**

7186 Stanhope Lane

Riverside, CA 92506  
mmmcatchup@gmail.com  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Marie Moreno Myers <mmmcatchup@gmail.com>  
**Sent:** Sunday, June 23, 2024 3:45 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Dear Ms. Hernandez:

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

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

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

## Section 5.14.6

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

- Yes, the project could have as many as 6 people in a one bedroom, potentially doubling the projected occupancy of 839 to over 1600, the population implications have not considered this issue as it relates to the local community of Mission Grove with less than 8000 residents. It's the unplanned population growth to the local community that has not been examined.
- Can you provide a detailed analysis of the potential for unplanned population growth resulting from the project, including scenarios where occupancy rates exceed the projected numbers, such as having up to 6 people in a one-bedroom unit?
- How do you plan to address the potential strain on local infrastructure, public services, and community resources if the actual population growth significantly exceeds the projections?
- What measures will be implemented to monitor and manage the actual occupancy rates of the residential units to ensure they align with the projected numbers and do not lead to unplanned population growth?
- Have you conducted any studies or assessments to evaluate the potential social and economic impacts of a substantial increase in population on the local community of Mission Grove, which currently has less than 8,000 residents?
- Can you provide examples of similar projects where unplanned population growth was effectively managed, and what strategies from those projects will be applied to mitigate potential impacts in Mission Grove?

### Summary

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

Thank you for your consideration of this letter.

Sincerely,

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**Sent:** Sunday, June 23, 2024 3:37 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

#### Alternative Uses - Section 7.0.2

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

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

#### Summary

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

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

Thank you for your consideration of this letter.

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Sent from my iPhone



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**Sent:** Sunday, June 23, 2024 11:13 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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of Riverside, Planning Division Email:  
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RE: Public comment on the record for the Mission Grove Apartments EIR, SCH #  
2022100610

Dear Ms. Hernandez:

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

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

## Alternative Uses - Section 7.0

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

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

- 

### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

***Marie Moreno Myers***

7186 Stanhope Lane

Riverside, CA 92506

Mission Grove Neighborhood Alliance

**From:** Marie Moreno Myers <mmmcatchup@gmail.com>  
**Sent:** Sunday, June 23, 2024 3:44 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

### Section 5.9.6

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

- MARB does not support this project.
- Given that the proposed density of 35 du/ac significantly exceeds both the ALUC maximum of 6 du/ac for Zone C2 and the area's historical maximum of 16 du/ac, what specific justifications can you provide for proposing such a dramatic increase in density?
- Have you conducted any studies or analyses to assess the potential impacts of this substantial density increase on local infrastructure, traffic patterns, and community services?
- How do you plan to address potential safety concerns related to the project's non-compliance with ALUC density requirements, particularly given its proximity to March Air Reserve Base?
- Can you provide examples of similar successful projects that have received approval for such significant deviations from ALUC requirements, and explain how those precedents might apply to this case?
- What specific mitigation measures or design features are you proposing to offset the potential negative impacts of exceeding the ALUC density requirements by such a large margin?

### Summary

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

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

## Section 5.9.6

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

- Nothing supports a project this far removed from the ALUC requirements. 35 units compared to 6 units is not even close. Why was this even proposed? The area has never exceeded 16 du/ac.
- Given that the proposed density of 35 du/ac significantly exceeds both the ALUC maximum of 6 du/ac for Zone C2 and the area's historical maximum of 16 du/ac, what specific justifications can you provide for proposing such a dramatic increase in density?
- Have you conducted any studies or analyses to assess the potential impacts of this substantial density increase on local infrastructure, traffic patterns, and community services?
- How do you plan to address potential safety concerns related to the project's non-compliance with ALUC density requirements, particularly given its proximity to March Air Reserve Base?
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More specifically, I would like to comment on the following sections related to the EIR:



### Section 3.3.2

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

- All these zoning requirements have been in place for a reason, so the community thrives and attracts new residents with a carefully designed structure and purpose that promotes safety, security and a quality of life. All these necessary changes shows no support for improving the community.
- Can you provide specific evidence or studies that demonstrate how the proposed Zoning Code Amendment from Commercial Retail to Mixed Use-Urban will enhance the safety, security, and quality of life for current and future residents of the community?
- What measures will be taken to ensure that the proposed zoning changes do not negatively impact the existing community structure and purpose that have been carefully designed to promote thriving neighborhoods?
- How does the proposed project plan to address potential concerns from residents regarding the integration of high-density residential units into an area currently zoned for commercial retail, particularly in terms of maintaining community cohesion and character?
- Can you provide detailed plans or examples of similar projects where a transition from Commercial Retail to Mixed Use-Urban zoning has successfully improved the community, and what lessons from those projects will be applied here?
- What specific benefits does the proposed Zoning Code Amendment offer to the existing community, and how do these benefits outweigh the potential negative impacts identified in the EIR, particularly in terms of traffic, parking, and overall community integration?

#### Summary

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

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

### Section 3.3.1

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

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

#### Summary

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

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

## Section 3.2.2

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

- No market studies, supply and demand analysis or other data has been provided to support a High Density residential property being dropped into a retail shopping center in a suburban neighborhood with nothing nearby even close to the density levels being proposed is going to improve the area. Not to mention the impacts of traffic and parking.
- Can you provide detailed market studies and supply/demand analyses that specifically justify the need for high-density residential development within this existing retail-focused area?
- How do you plan to mitigate the potential impacts on traffic and parking, given that the proposed high-density residential project will be situated in a primarily retail and lower-density residential area?
- What specific measures will be implemented to ensure a smooth transition between the proposed high-density development and the surrounding lower-density residential and commercial areas?
- Have you conducted any community impact assessments to determine how the introduction of a high-density residential property might affect the character and functionality of the existing suburban neighborhood?
- Given the significant difference in density between the proposed project and the surrounding areas, what specific benefits do you anticipate this development will bring to the existing community that outweigh potential negative impacts?

### Summary

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

Thank you for your consideration of this letter.

Sincerely,

**Marie Moreno Myers**

7186 Stanhope Lane

Riverside, CA 92506

mmmcatchup@gmail.com

Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** Marie Moreno Myers <mmmcatchup@gmail.com>  
**Sent:** Sunday, June 23, 2024 3:42 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Dear Ms. Hernandez:

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

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

More specifically, I would like to comment on the following sections related to the EIR: Section 3.2



Mission Grove Specific Plan - the project site is located within an area designated as Retail Business & Office and generally in the central portion of the Specific Plan.

- No market data has been presented to support changing this area designation to Residential.
- Can you provide comprehensive market data and analysis that justifies changing the area designation from Retail Business & Office to Residential, particularly considering the site's central location within the Specific Plan area?
- How does the proposed residential development align with the original intent and goals of the Mission Grove Specific Plan, and what specific benefits will it bring to the area that the current Retail Business & Office designation does not?
- Have you conducted any studies to assess the potential economic impact of removing retail and office space from this central location, and if so, what were the findings?
- What measures do you propose to ensure that the loss of potential retail and office space in this area won't negatively impact local employment opportunities or the overall economic balance of the Mission Grove area?
- Can you provide examples of similar successful conversions from Retail Business & Office to Residential in comparable specific plan areas, and what lessons from those projects can be applied to ensure the success of this proposed change?

#### Summary

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

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

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

### Section 3.2.2

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

- This is not an Urban area , it is suburban neighborhood with commercial and retail services to support the community. This project will allow a high density residential project to be dropped in the middle of a retail shopping center in which there is no data to support any additional integration of features. It shows the project will disrupt the flow of traffic, create parking problems and no positive shared elements. The EIR statements are biased and in favor of the project.
- Can you provide specific data and analysis demonstrating how the proposed high-density residential project will integrate successfully with the existing suburban retail environment, particularly in terms of traffic flow and parking?
- What concrete evidence do you have to support the claim that this project will enhance pedestrian connectivity and walkability in an area primarily designed for car-dependent retail?
- How does the proposed Mixed Use-Urban designation align with the broader community planning goals for this suburban neighborhood, and what studies have been conducted to assess its impact on the existing community character?
- Can you provide detailed traffic impact studies that specifically address how the introduction of high-density residential units will affect traffic patterns and congestion in the surrounding retail areas?
- What specific shared elements are planned between the residential and retail components, and how will these be implemented to ensure they genuinely benefit both the new residents and existing retail businesses without disrupting current operations?

### Summary

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**Sent:** Sunday, June 23, 2024 3:45 PM  
**To:** Hernandez, Veronica  
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More specifically, I would like to comment on the following sections related to the EIR:

#### Section 5.16.4

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

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

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**From:** MARUTA RATERMAN <maruraterm@aol.com>  
**Sent:** Sunday, June 23, 2024 9:11 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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



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

### Summary

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5544 Inner Circle Dr  
Riverside Ca 92506  
Name, and address  
Mission Grove Neighborhood Alliance

Sent from my iPhone

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**Sent:** Sunday, June 23, 2024 9:08 PM  
**To:** Hernandez, Veronica  
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More specifically, I would like to comment on the following sections related to the EIR: Section 4.3

Developments Considered in Cumulative Impact Analysis Total of six (6) developments

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

- No other high density projects in the area except the new project at Van Buren and Wood Str.

- Can you provide a detailed analysis of how the proposed high-density residential project will interact with the existing and planned developments in the area, particularly the commercial and warehouse projects mentioned in the cumulative impact analysis?

- What specific measures will be taken to mitigate any potential cumulative impacts on traffic, infrastructure, and public services resulting from the combination of your project and the other developments in the area?

- How does the proposed high-density residential project align with the overall land use and development strategy for the area, given that there are no other high-density projects except the one at Van Buren and Wood Street?

- Have you conducted any studies to assess the potential economic and social impacts of introducing a high-density residential project in an area predominantly characterized by commercial and warehouse developments?

- Can you provide examples of similar areas where high-density residential projects have been successfully integrated with commercial and warehouse developments, and what lessons from those projects will be applied to ensure the success of this proposed development?

## Summary

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MARUTA Raterman  
5544 Inner Circle

Riverside Ca 92506

Sent from my iPhone

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**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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Riverside Ca 9256  
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Alternative Uses - Section 7.0.6



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

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

### Summary

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**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

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

Section 5.9.6

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

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

#### Summary

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

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

Thank you for your consideration of this letter.

MARUTA Raterman  
5544 Inner Circle  
Riverside Ca 92506  
Sincerely,

Name, and address  
Mission Grove Neighborhood Alliance

**From:** MARUTA RATERMAN <maruraterm@aol.com>  
**Sent:** Sunday, June 23, 2024 9:22 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

### Summary

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Thank you for your consideration of this letter.

Sincerely,  
MARUTA Raterman

5544 Inner Circle Dr  
Riverside Ca 92506  
Name, and address  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** MARUTA RATERMAN <maruraterm@aol.com>  
**Sent:** Sunday, June 23, 2024 9:20 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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More specifically, I would like to comment on the following sections related to the EIR: Section 6.3



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

- The project will increase energy and utility demands.
- Can you provide a detailed analysis of the projected increase in local demand for non-renewable energy resources, such as petroleum products and natural gas, due to the operation of the project?
- What specific measures will be implemented to ensure that increasingly efficient building designs will effectively offset the increased energy demands of the project?
- How do you plan to mitigate the long-term environmental impacts and irreversible changes associated with the increased use of non-renewable resources?
- Have you conducted any risk assessments to evaluate the potential for environmental accidents associated with the project, and what measures will be taken to prevent and respond to such incidents?
- Can you provide examples of similar projects where efficient building designs have successfully reduced energy demands, and what lessons from those projects will be applied to ensure the sustainability of this development?

### Summary

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

Thank you for your consideration of this letter.

Sincerely,  
MARUTA Raterman  
5544 Inner Circle Dr  
Riverside ca 92506

Name, and address  
Mission Grove Neighborhood Alliance

**From:** MARUTA RATERMAN <maruraterm@aol.com>  
**Sent:** Sunday, June 23, 2024 9:18 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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2022100610

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More specifically, I would like to comment on the following sections related to the EIR: Section 5.3.5

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

- The addition of 600-800 vehicles each day in the area would have a damaging effect on air quality. Leaving in the morning and returning in the evening with increased traffic on already crowded roads. The solution is to modify the traffic signals?
- Can you provide detailed traffic impact studies that specifically address how the addition of 600-800 vehicles daily will affect air quality in the area, particularly during peak morning and evening hours?
- What specific mitigation measures, beyond modifying traffic signals, do you propose to reduce the cumulative air quality impacts from the increased vehicle traffic generated by the project?
- Have you conducted any air quality modeling to assess the potential increase in criteria pollutants, especially those for which the region is already in nonattainment? If so, can you share the results and methodology?
- How does your project plan to encourage alternative transportation methods to reduce reliance on personal vehicles and mitigate air quality impacts?
- Can you provide a comprehensive analysis of how the project's cumulative air quality impacts, when combined with other planned developments in the area, align with regional air quality improvement goals and plans?

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Sincerely,  
MARUTA Raterman  
5544 Inner Circle Dr  
Riverside Ca 92506  
Name, and address  
Mission Grove Neighborhood Alliance

Sent from my iPhone

**From:** MARUTA RATERMAN <maruraterm@aol.com>  
**Sent:** Sunday, June 23, 2024 9:16 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

### Summary

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

Thank you for your consideration of this letter.

Sincerely,  
MARUTA Raterman  
5544 Inner Circle Dr  
Riverside Ca 92506  
Name, and address  
Mission Grove Neighborhood Alliance

**From:** Michael McCarthy <MikeM@radicalresearch.llc>  
**Sent:** Monday, June 24, 2024 9:18 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Mission Grove Apartments SCH #2022100610 public comment  
**Attachments:** [MissionGrove\\_EIR.pdf](#)

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Veronica,

Attached please find comments on the Mission Grove Apartments Project. Please confirm receipt of this comment letter when you get an opportunity.

Thanks!

**Mike McCarthy**

Ward 4  
92508

**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:24 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

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Thank you for your consideration of this letter.

Sincerely,

Norman Cole  
166 Acacia Glen Dr  
Riverside Ca 92506  
Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device



**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:23 AM  
**To:** Hernandez, Veronica  
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More specifically, I would like to comment on the following sections related to the EIR: Section 4.3

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

- No other high density projects in the area except the new project at Van Buren and Wood Str.
- Can you provide a detailed analysis of how the proposed high-density residential project will interact with the existing and planned developments in the area, particularly the commercial and warehouse projects mentioned in the cumulative impact analysis?
- What specific measures will be taken to mitigate any potential cumulative impacts on traffic, infrastructure, and public services resulting from the combination of your project and the other developments in the area?
- How does the proposed high-density residential project align with the overall land use and development strategy for the area, given that there are no other high-density projects except the one at Van Buren and Wood Street?
- Have you conducted any studies to assess the potential economic and social impacts of introducing a high-density residential project in an area predominantly characterized by commercial and warehouse developments?
- Can you provide examples of similar areas where high-density residential projects have been successfully integrated with commercial and warehouse developments, and what lessons from those projects will be applied to ensure the success of this proposed development?

## Summary

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Riverside CA 92506  
Mission Grove Neighborhood Alliance

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

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

## Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

Norman Cole  
166 Acacia Glen Dr  
Riverside Ca 92506  
Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:21 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

Dear Ms. Hernandez:

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

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

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

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

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

## Section 6.2

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

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

### Summary

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

Thank you for your consideration of this letter.

Sincerely,



Norman Cole  
166 Acacia Glen Dr  
Riverside ca 92506  
Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:20 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

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

## Section 5.17.5

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

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

### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

Norman Cole  
166 Acacia Glen Dr  
Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:18 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

## Section 5.17.5

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

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

### Summary

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

Thank you for your consideration of this letter.

Sincerely,

Norman Cole

166 Acacia Glen Dr.  
Riverside, CA 92506  
Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 3:12 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 5.9.6 March Air Reserve Base/United States Air Force Input -On July 31, 2023, the Air Force provided comments supporting ALUC's recommendation of inconsistency due to concerns with the project's inconsistent density. • MARB does not support this project. • Given that the proposed density of 35 du/ac significantly exceeds both the ALUC maximum of 6 du/ac for Zone C2 and the area's historical maximum of 16 du/ac, what specific justifications can you provide for proposing such a dramatic increase in density? • Have you conducted any studies or analyses to assess the potential impacts of this substantial density increase on local infrastructure, traffic patterns, and community services? • How do you plan to address potential safety concerns related to the project's non-compliance with ALUC density requirements, particularly given its proximity to March Air Reserve Base? • Can you provide examples of similar successful projects that have received approval for such significant deviations from ALUC requirements, and explain how those precedents might apply to this case? • What specific mitigation measures or design features are you proposing to offset the potential negative impacts of exceeding the ALUC density requirements by such a large margin? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely,  
Norman Cole  
Mission Grove Neighborhood Alliance  
166 Acacia Glen Dr.



**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 3:11 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Sincerely,  
Norman Cole  
Mission Grove Neighborhood Alliance

166 Acacia Glen Dr.  
Riverside, CA 92506

**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 3:10 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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- All these zoning requirements have been in place for a reason, so the community thrives and attracts new residents with a carefully designed structure and purpose that promotes safety, security and a quality of life. All these necessary changes shows no support for improving the community.
- Can you provide specific evidence or studies that demonstrate how the proposed Zoning Code Amendment from Commercial Retail to Mixed Use-Urban will enhance the safety, security, and quality of life for current and future residents of the community?
- What measures will be taken to ensure that the proposed zoning changes do not negatively impact the existing community structure and purpose that have been carefully designed to promote thriving neighborhoods?
- How does the proposed project plan to address potential concerns from residents regarding the integration of high-density residential units into an area currently zoned for commercial retail, particularly in terms of maintaining community cohesion and character?
- Can you provide detailed plans or examples of similar projects where a transition from Commercial Retail to Mixed Use-Urban zoning has successfully improved the community, and what lessons from those projects will be applied here?
- What specific benefits does the proposed Zoning Code Amendment offer to the existing community, and how do these benefits outweigh the potential negative impacts identified in the EIR, particularly in terms of traffic, parking, and overall community integration?

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

Thank you for your consideration of this letter.

Sincerely,

Norman Cole

Mission Grove Neighborhood Alliance

166 Acacia Glen Dr.

Riverside, CA 92506

**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 3:09 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 3:08 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: VHernandez@riversideca.gov RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Section 3.2.2 The site is bordered on the north, west, and east (across Mission Grove Parkway) by the Mission Grove Plaza Shopping Center, which has a General Plan Land Use Designation of C - Commercial and is zoned CR-SP - Commercial Retail and Specific Plan (Mission Grove) Overlay Zones, and is developed with retail uses. Multi-family residences are located further north (across Alessandro Boulevard), which have a General Plan Land Use Designation of HDR – High-Density Residential, and are zoned R-3-3000-SP – Multi-Family Residential and Specific Plan (Mission Grove) Overlay Zones. The project site is bordered on the south by a single-family residential neighborhood (across Mission Village Drive), which has a General Plan Land Use Designation of Medium High Density Residential (MHDR) and is zoned R-1-7000-SP – Single-Family Residential and Specific Plan (Mission Grove) Overlay Zones. • No market studies, supply and demand analysis or other data has been provided to support a High Density residential property being dropped into a retail shopping center in a suburban neighborhood with nothing nearby even close to the density levels being proposed is going to improve the area. Not to mention the impacts of traffic and parking. • Can you provide detailed market studies and supply/demand analyses that specifically justify the need for high-density residential development within this existing retail-focused area? • How do you plan to mitigate the potential impacts on traffic and parking, given that the proposed high-density residential project will be situated in a primarily retail and lower-density residential area? • What specific measures will be implemented to ensure a smooth transition between the proposed high-density development and the surrounding lower-density residential and commercial areas? • Have you conducted any community impact assessments to determine how the introduction of a high-density residential property might affect the character and functionality of the existing suburban neighborhood? • Given the significant difference in density between the proposed project and the surrounding areas, what specific benefits do you anticipate this development will bring to the existing community that outweigh potential negative impacts? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City

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

Thank you for your consideration of this letter.

Sincerely,

Norman Cole

Mission Grove Neighborhood Alliance

166 Acacia Glen Dr.

Riverside, CA 92506



**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 3:07 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 3:06 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Riverside, CA 92506

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**Sent:** Sunday, June 23, 2024 3:05 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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Riverside, CA 92506

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**Sent:** Sunday, June 23, 2024 3:04 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Thank you for your consideration of this letter.

Sincerely,

Norman Cole

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Riverside, CA 92506

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**To:** Hernandez, Veronica  
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**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter.

Sincerely,

Norman Cole

Mission Grove Neighborhood Alliance

166 Acacia Glen Dr.

Riverside, CA 92506

**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 3:00 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Sincerely,  
Norman Cole



Mission Grove Neighborhood Alliance  
166 Acacia Glen Dr.  
Riverside, CA 92506

**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 2:59 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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**Sent:** Sunday, June 23, 2024 2:57 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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**Sent:** Sunday, June 23, 2024 2:48 PM  
**To:** Hernandez, Veronica  
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Riverside, CA 92506 Mission Grove Neighborhood Alliance

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**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Thank you for your consideration of this letter.

Sincerely,

Norman Cole

Mission Grove Neighborhood Alliance

166 Acacia Glen Dt.

Riverside CA 92506

Mission Grove Neighborhood Alliance

**From:** Norman Cole <nd.cole@sbcglobal.net>  
**Sent:** Sunday, June 23, 2024 2:44 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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Sincerely,  
Norman Cole  
166 Acacia Glen Dr

**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:29 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

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

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

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

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

## Summary

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

Thank you for your consideration of this letter.

Sincerely,

Norman Cole  
166 Acacia Glen Dr

**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:28 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

More specifically, I would like to comment on the following sections related to the EIR: Section 6.3



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

- The project will increase energy and utility demands.
- Can you provide a detailed analysis of the projected increase in local demand for non-renewable energy resources, such as petroleum products and natural gas, due to the operation of the project?
- What specific measures will be implemented to ensure that increasingly efficient building designs will effectively offset the increased energy demands of the project?
- How do you plan to mitigate the long-term environmental impacts and irreversible changes associated with the increased use of non-renewable resources?
- Have you conducted any risk assessments to evaluate the potential for environmental accidents associated with the project, and what measures will be taken to prevent and respond to such incidents?
- Can you provide examples of similar projects where efficient building designs have successfully reduced energy demands, and what lessons from those projects will be applied to ensure the sustainability of this development?

#### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

Norman Cole  
166 Acacia Glen Dr  
Riverside, Ca 92506  
Mission Grove Neighborhood Alliance

**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:27 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

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

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

## Summary

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Thank you for your consideration of this letter.

Sincerely,

Norman Cole  
166 Acacia Glen Dr  
Riverside ca 92506  
Mission Grove Neighborhood Alliance

Sent from my T-Mobile 4G LTE Device

**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:26 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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2022100610

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More specifically, I would like to comment on the following sections related to the EIR: Section 5.3.5

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

- The addition of 600-800 vehicles each day in the area would have a damaging effect on air quality. Leaving in the morning and returning in the evening with increased traffic on already crowded roads. The solution is to modify the traffic signals?
- Can you provide detailed traffic impact studies that specifically address how the addition of 600-800 vehicles daily will affect air quality in the area, particularly during peak morning and evening hours?
- What specific mitigation measures, beyond modifying traffic signals, do you propose to reduce the cumulative air quality impacts from the increased vehicle traffic generated by the project?
- Have you conducted any air quality modeling to assess the potential increase in criteria pollutants, especially those for which the region is already in nonattainment? If so, can you share the results and methodology?
- How does your project plan to encourage alternative transportation methods to reduce reliance on personal vehicles and mitigate air quality impacts?
- Can you provide a comprehensive analysis of how the project's cumulative air quality impacts, when combined with other planned developments in the area, align with regional air quality improvement goals and plans?

#### Summary

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

Thank you for your consideration of this letter.

Sincerely,

Norman Cole  
166 Acacia Glen Dr  
Riverside Ca 92506  
Mission Grove Neighborhood Alliance

**From:** nd.cole <nd.cole@sbcglobal.net>  
**Sent:** Monday, June 24, 2024 11:25 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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VHernandez@riversideca.gov

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2022100610

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Thank you for your consideration of this letter.

Sincerely,

Norman Cole  
166 Acacia Glen Dr



**From:** PATTI WESTBROOK <pattiback@msn.com>  
**Sent:** Sunday, June 23, 2024 10:17 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] KMART APARTMENT PROJECT

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

Veronica Hernandez, Senior Planner City  
of Riverside, Planning Division Email:  
[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)

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

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

I am a Mission Grove homeowner and do not want these apartments at the center. We want more restaurant choices and shopping.

Patti Westbrook  
130 Cape Elizabeth Way....Riverside.

**From:** Patty Huddleston <huddlestonpatty@gmail.com>  
**Sent:** Monday, June 24, 2024 10:29 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Veronica Hernandez, Senior Planner City of Riverside, Planning Division Email: [VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov) RE: Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610 Dear Ms. Hernandez: Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments (Project). The project consists of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. The information and analysis must be presented in an unbiased manner; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways, including the City of Riverside land use policies, The General Plan, the Mission Grove Specific Plan, the current Zoning, and the VMT impact would be significant and unavoidable as it relates to transportation, the Airport Land Use Commission (ALUC) flight path inconsistency for dwelling density, and the City of Riverside policies regarding development around March Air Reserve Base. I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR: Alternative Uses - Section 7.0.5 Alternative 3, the Retail Development Alternative, would consist of retaining the existing retail building and associated surface parking lot with only minor improvements to the inside and/or exterior of the building and/or associated surface parking lot and landscaping. The existing building would house a permanent retail tenant utilizing the full square footage of the building for retail. • Have you conducted a comprehensive market analysis to determine the viability of attracting a large-scale retail tenant for the entire building, and if so, what were the key findings? • How does the potential economic impact of retaining the site as retail compare to your proposed residential development regarding job creation, local tax revenue, and overall community benefit? • If selling the property to a retailer is considered, what criteria would you use to ensure the new owner's plans align with the city's long-term development goals and the needs of the surrounding community? • Have you explored any mixed-use alternatives that could incorporate retail and residential components, potentially

preserving some of the existing structure while addressing housing needs? • Given the trend of repurposing retail spaces for alternative uses, as mentioned in the search results, what innovative approaches have you considered for this site beyond traditional retail or residential development? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Patty Huddleston 639 Burwood Ct Mission Grove Neighborhood Alliance

**From:** Patty Huddleston <huddlestonpatty@gmail.com>  
**Sent:** Monday, June 24, 2024 10:28 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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relocating the project to a different infill site within Riverside affect its ability to meet the city's housing goals and align with existing infrastructure and transit corridors? • Can you provide a comparative analysis of the potential environmental impacts, particularly regarding traffic and resource consumption, between the proposed site and a hypothetical alternative location with similar characteristics? • Given that the project focuses on infill development of abandoned or underutilized spaces, what specific challenges or opportunities do you foresee in adapting this 347-unit residential concept to other vacant or underutilized sites within Riverside? Summary The project is currently inconsistent with several City policies and development standards. It could be mitigated through a genuinely mixed-use project with ground-floor retail and a unit mix that meets the market needs. The City of Riverside should aim to maximize its consistency with ALL relevant policies in its General Plan, Specific Plan, ALUC consistency, and zoning development standards for this project and others rather than override those inconsistencies to give primacy to the RHNA residential needs alone. The City should make steady progress toward its residential housing goals while maximizing its consistency with existing planning guidelines and protecting the well-being of current residents. Thank you for your consideration of this letter. Sincerely, Patty Huddleston 639 Burwood Ct. Mission Grove Neighborhood Alliance

**From:** Rainee Khabagnote <raineealexisk@gmail.com>  
**Sent:** Monday, June 24, 2024 7:49 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Dear Ms. Hernandez:

Thank you for the hearing our comments on the Draft Environmental Impact Report (EIR) on the Mission Grove Apartments project consisting of demolishing the existing vacant Kmart located in the middle of the Mission Grove Shopping Center and developing a high-density 347-unit residential apartment project on a 9.92-acre parcel. The EIR must meet CEQA requirements that include an impartial analysis of the proposed project. In keeping with this admonition, alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

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

As a Riverside resident, I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for us residents. My husband and I specifically moved to Mission Grove because we wanted a suburban community. I believe adding at least more than 347 families would hugely affect traffic and community experience. In addition as a physician, I am deeply concerned about the years of construction proposed adjacent to our neighborhood. My husband and I specifically picked this neighborhood because it was away from major roads and construction for air quality and health reasons. Lastly, I don't believe the traffic caused by this project and then the minimum 347 more residents would be mitigated by adjusting traffic lights. We have already experienced major traffic from the short-term projects done on Alessandro. If this project were to be approved as is, my husband and I would strongly consider leaving this area because it in essence changes our community. More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.4

Under Alternative 2, the Reduced Density Apartment Redevelopment, the proposed

residential development would consist of 58 dwelling units in lieu of the proposed Project's 347 dwelling units.

- The ALUC will allow higher density than 6 du/ac. The surrounding area shows densities as high as 16 du/ac. A 16du/ac with retail on the bottom floor would be more compatible with the area. Especially if the unit mix concentrated on 2 and 3 bedroom.
  - Given that the surrounding area shows densities up to 16 dwelling units per acre, why have you chosen a significantly lower density of 58 units for Alternative 2, rather than exploring a middle ground that could better align with the neighborhood character?
  - Have you conducted any studies to determine how a mixed-use development with retail on the ground floor and residential units above (at 16 du/ac) would impact local economic vitality and housing affordability compared to your current proposal?
  - Can you provide a comparative analysis of the environmental impacts, particularly regarding traffic and infrastructure demands, between your proposed 347-unit development and a potential 16 du/ac mixed-use alternative?
  - How would focusing on two and 3-bedroom units in a higher-density scenario affect the project's ability to meet local housing needs, especially for families, compared to your current unit mix?
  - Considering that the Airport Land Use Commission (ALUC) allows for higher density than six du/ac, what factors led to the decision to propose such a low-density alternative, and how does this align with broader city planning goals for efficient land use and housing provision.
- 
- Have you conducted a comprehensive market analysis to determine the viability of attracting a large-scale retail tenant for the entire building, and if so, what were the key findings?
  - Have you explored any mixed-use alternatives that could incorporate retail and residential components, potentially preserving some of the existing structure while addressing housing needs?
- 
- Moving the Project to a similar location but mitigating some of the issues.
  - What specific criteria did you use to determine that no alternative sites within the City of Riverside were suitable for consideration, and can you provide documentation of this site selection process?

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

#### Summary

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

Sincerely,

Rainee Khabagnote and Michael Choi  
945 High Peak Drive, Riverside CA 92506  
Mission Grove Neighborhood Alliance



**From:** Ira and Rajean Long <longfam611@gmail.com>  
**Sent:** Monday, June 24, 2024 8:19 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

Dear Ms. Hernandez:

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

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

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

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

## Section 5.9.6

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

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

### Summary

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

Thank you for your consideration of this letter.

Sincerely,

Ira and Rajean Long  
7048 City View Circle  
Riverside, CA 92506  
Mission Grove Neighborhood Alliance

**From:** Ira and Rajean Long <longfam611@gmail.com>  
**Sent:** Monday, June 24, 2024 8:18 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

Dear Ms. Hernandez:

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

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

## Section 5.17.5

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

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

### Summary

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

Thank you for your consideration of this letter.

Sincerely,  
Ira and Rajean Long  
7048 City View Circle  
Riverside, CA 92506  
Mission Grove Neighborhood Alliance

**From:** Ira and Rajean Long <longfam611@gmail.com>  
**Sent:** Monday, June 24, 2024 8:18 AM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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

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

## Section 5.17.5

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

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

### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

Ira and Rajean Long  
7048 CityView Circle  
Riverside, CA 92506

**From:** Tony Haro <tonyhara006@gmail.com>  
**Sent:** Monday, June 24, 2024 1:33 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Veronica Hernandez, Senior Planner City  
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RE: Public comment on the record for the Mission Grove Apartments EIR, SCH #  
2022100610

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I have serious concerns about the viability of this project, its influence on the community, and the effect on the quality of life for the residents in the area. More specifically, I would like to comment on the following sections related to the EIR:

Alternative Uses - Section 7.0.6



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

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

### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

Name, and address  
Mission Grove Neighborhood Alliance

**From:** Tony Haro <tonyhara006@gmail.com>  
**Sent:** Monday, June 24, 2024 1:35 PM  
**To:** Hernandez, Veronica  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610

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Alternative Uses - Section 7.0.6

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

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

### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,  
Antonio Haro  
269 Cannon Rd. Riverside, Ca 92506  
Mission Grove Neighborhood Alliance

**From:** [Jeanne O'Neill](#)  
**To:** [Hernandez, Veronica](#)  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610  
**Date:** Wednesday, June 26, 2024 5:32:54 PM

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

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

[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)

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

Dear Ms. Hernandez:

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

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

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

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

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

Alternative Uses - Section 7.0.6

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

evaluated under this alternative.

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

#### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,.

Jeanne O'Neill, 8167 Faircrest Road, Riverside, CA, 92508.  
Mission Grove Neighborhood Alliance

**From:** [Jeanne O'Neill](#)  
**To:** [Hernandez, Veronica](#)  
**Subject:** [EXTERNAL] Public comment on the record for the Mission Grove Apartments EIR, SCH # 2022100610  
**Date:** Wednesday, June 26, 2024 5:37:23 PM

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Veronica Hernandez, Senior Planner City  
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2022100610

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on

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

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

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

More specifically, I would like to comment on the following sections related to the EIR:  
Section 5.3.5

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

- The addition of 600-800 vehicles each day in the area would have a damaging effect on air  
quality. Leaving in the morning and returning in the evening with increased traffic on already  
crowded roads. The solution is to modify the traffic signals?
- Can you provide detailed traffic impact studies that specifically address how the addition of  
600-800 vehicles daily will affect air quality in the area, particularly during peak morning and  
evening hours?
- What specific mitigation measures, beyond modifying traffic signals, do you propose to  
reduce the cumulative air quality impacts from the increased vehicle traffic generated by the  
project?
- Have you conducted any air quality modeling to assess the potential increase in criteria  
pollutants, especially those for which the region is already in nonattainment? If so, can you  
share the results and methodology?
- How does your project plan to encourage alternative transportation methods to reduce

reliance on personal vehicles and mitigate air quality impacts?

- Can you provide a comprehensive analysis of how the project's cumulative air quality impacts, when combined with other planned developments in the area, align with regional air quality improvement goals and plans?

#### Summary

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

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

Thank you for your consideration of this letter.

Sincerely,

Pam O'Neill  
8167 Faircrest Road  
Riverside, CA 92508