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VIA EMAIL

June 12, 2025

Paige Montojo, Senior Planner
Community & Economic Development Department
Planning Division
City of Riverside
3900 Main Street, 3rd Floor
Riverside, California 92522
PMontojo@riversideca.gov

Jennifer Lilley, Director
Community & Economic Development Department
City of Riverside
3900 Main Street, 5th Floor
Riverside, CA 92522
JLilley@riversideca.gov

Donesia Gause, MMC, City Clerk
City of Riverside
3900 Main Street, 7th Floor
Riverside, CA 92522
city_clerk@riversideca.gov

Re: CEQA and Land Use Notice Request for Riverside Alive Project (PR-2024-001675, SCH 2024100396)

Dear Ms. Montojo, Ms. Lilley, and Ms. Gause,

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the project known as Riverside Alive Project (PR-2024-001675, SCH 2024100396), including all actions referring or related to the proposed development of combination of new residential, office, retail, and hotel uses; a Convention Center expansion; and new parking facilities in place of the existing Lot 33 and Outdoor Plaza, located within Riverside East USGS 7.5-minute quad in Section 23, Township 2 South, Range 5 West, of the San Bernardino Baseline Meridian, on Accessor Parcel Numbers 213-11-011, 213-111-012, 213-111-014, 213-111-015, 213-111-016 in the City of Riverside ("Project").

We hereby request that the City of Riverside ("City") send by electronic mail, if possible, or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.

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June 12, 2025

CEQA and Land Use Notice Request for Riverside Alive Project (PR-2024-001675, SCH 2024100396)

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- Notices of determination that an Environmental Impact Report (“EIR”) is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
- Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
- Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
- Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
- Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of any addenda prepared to a previously certified or approved EIR.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

Please send notice by electronic mail, if possible, or U.S. Mail to:

Richard Drury
Leslie Reider
Madeline Dawson
Chase Preciado
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
richard@lozeaudrury.com
leslie@lozeaudrury.com
madeline@lozeaudrury.com
chase@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Leslie Reider
Lozeau | Drury LLP

Cont.
A-1

From: Montojo, Paige
Sent: Tuesday, June 17, 2025 12:12 PM
To: Mauricio Alvarez <malvarez@riversidetransit.com>
Subject: RE: Riverside Alive Project

Hi Mauricio,

Thank you for your comment, it has been received and will be included in the record. Please let me know if you have any follow up questions or comments.

Thanks,

Paige Montojo | Senior Planner
City of Riverside | 951.826.5773

From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Tuesday, June 17, 2025 12:08 PM
To: Montojo, Paige <PMontojo@riversideca.gov>
Subject: [EXTERNAL] Riverside Alive 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.

Hello Paige,

Thank you for including RTA in the development review of the Riverside Alive Project. After reviewing the plans, there is one recommendation to provide. The recommendation is to incorporate pedestrian walkways throughout the project site to provide a safe path for people to connect to public transportation. RTA has active bus stops on Market Street, including a stop on Market & Third, near the project site, that people can easily utilize.

Thank you for considering this comment.

Mauricio Alvarez, MBA
Planning Analyst
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)
1825 Third Street, Riverside, CA 92507

Stay in-the-know with all things Riverside! Connect with us at RiversideCA.gov/Connect.



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Oakland, CA 94612

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Via Email

July 7, 2025

Paige Montojo, Senior Planner
Community & Economic Development Department
Planning Division
City of Riverside
3900 Main Street, 3rd Floor
Riverside, CA 92522
PMontojo@Riversideca.gov

**Re: Comment on Draft Environmental Impact Report, Riverside Alive
Project (Case No.: PR-2024-001675, SCH 2024100396)**

Dear Planner Montojo:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Draft Environmental Impact Report (“DEIR”) prepared for Riverside Alive Project (Case No.: PR-2024-001675, SCH 2024100396), which proposes the construction of a 9-story, 113-unit residential building, a 6-story 208-unit hotel, a 168-unit hotel, 14-stories and 220,000 square-feet of office space, and a 5-story parking structure, located within Riverside East USGS 7.5-minute quad in Section 23, Township 2 South, and Range 5 West, of the San Bernardino Baseline Meridian on Accessor Parcel Numbers 213-11-011, 213-111-012, 213-111-014, 213-111-015, 213-111-016, in the City of Riverside (“Project”).

C-1

SAFER is concerned that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts. SAFER requests that the Community & Economic Development Department address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project.

C-2

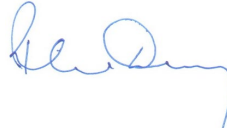
SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

July 7, 2025

Comment on Draft Environmental Impact Report, Riverside Alive Project (Case No.: PR-2024-001675, SCH 2024100396)

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Sincerely,



Richard Drury
Lozeau Drury LLP

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Cont.

California Department of Transportation

DISTRICT 8
464 WEST 4TH STREET
SAN BERNARDINO CA, 92401
(909) 925-7520
www.dot.ca.gov



July 7, 2025

Route & Postmile #: SR-91 / 20.754
Cross Street: 3rd St, 5th St, Market St and Orange St
GTS ID: 36636
SCH #: 2024100396

City of Riverside
Planning Division
Attn: Paige Montojo
3900 Main St 3rd Floor,
Riverside, CA 92501

Subject: Riverside Alive Project Draft Environmental Impact Report

The California Department of Transportation (Caltrans) Local Development Review (LDR) Branch has completed its review of the Riverside Alive Project, Draft Environmental Impact Report (EIR) and its related documents. The project is in the City of Riverside and consists of the following Assessor Parcel Numbers (APNs) 213-111-011, 213-111-012, 213-111-014, 213-111-015, 213-111-016 and entails an approximately 10-gross acres. The nearest interchange (SR-91 & Mission Inn Avenue) is located approximately half of mile from the project site.

The City of Riverside is considering the development of the Riverside Alive Project, a new mixed-use entertainment and hospitality development. While no formal development application has been submitted, the Project outlines general "development envelopes" reflecting the maximum potential densities on the site. Key proposed components include:

- 168 residential units (for-sale and for-rent),
- 376 hotel rooms,
- 220,000 sq. ft. of Class A office space,
- 61,981 sq. ft. of commercial retail (including restaurants and personal services),
- 189,000 sq. ft. of expanded Convention Center space (exhibition, support, etc.),
- A five-level subterranean parking structure,
- A new outdoor pedestrian plaza and flexible gathering space.

The development would replace the existing Lot 33 and Outdoor Plaza. Utility connections may be reconfigured (but not expanded) to serve new buildings. Anticipated off-site infrastructure upgrades include upsizing 1,700 feet of sewer line along Market Street and replacing the potable water main on Third Street between Orange and Market Streets.

"Improving lives and communities through transportation"

Based on the available Draft EIR documents, we are submitting the following comments and recommendations for your consideration:

↑ D-1
Cont.

Vehicle Miles Traveled (VMT)

The project is located within a Transit Priority Area (TPA) and is therefore presumed to have less-than-significant impacts related to VMT. As a result, a project-level VMT analysis is not required. Caltrans has reviewed and concurs with this determination.

D-2

Traffic Operations

Traffic Impact Analysis

1. Please include the ramp merge and diverge analysis at the SR-60/Main Street eastbound and westbound directions to determine the impacts of the development at this location, if any.
2. Please include the ramp merge and diverge analysis at the SR-91/Mission Avenue eastbound and westbound directions to determine the impacts of the development at this location, if any.
3. Please use the Caltrans Transportation Impact Study Guide (May 20, 2020) for VMT Screening Analysis and include finding in the VMT report.
4. Please include the queuing analysis calculations in the report.

D-3

D-4

D-5

Active Transportation and Complete Streets

The development of the project site should include meaningful improvements for non-motorized travel, particularly with respect to circulation and through-movement. Currently, the street network is disrupted where Main Street terminates at 3rd Street, presenting a break in connectivity for pedestrians and bicyclists traveling to and from the downtown core.

As noted in the Draft EIR (Section 5.1, page 5.1-16; PDF page 142), the proposed Outdoor Plaza incorporates pedestrian pathways. However, the design of the plaza must not create barriers to users of wheeled mobility devices. The existing plaza, due to its topography, already impedes through-movement for both bicyclists and some pedestrians. To address this, the project should include a logical extension of Main Street as a non-motorized pathway or parkway, enabling safe and continuous passage for pedestrians and bicyclists traveling north into and out of the downtown area.

D-6

This recommendation is consistent with the City of Riverside's General Plan 2025, specifically Policy LU-11.3, which encourages the provision of enhanced bicycle and pedestrian access along parkways as part of the development process. By integrating a continuous non-motorized route through the site, the project would reduce reliance on surrounding streets for pedestrian and bicycle traffic, increase separation from moving and parked vehicles, and channel foot and bicycle traffic directly through the development. These improvements could ultimately support stronger economic outcomes by increasing foot traffic and accessibility to site amenities.

Equitable Access

If any Caltrans facilities are impacted by the project, they must comply with American Disabilities Act (ADA) Standards upon project completion. Additionally, the project must ensure the maintenance of bicycle and pedestrian access throughout the construction phase. These access considerations align with Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

D-7

Caltrans Encroachment Permit

Any permanent work or temporary traffic control that encroaches onto Caltrans' Right-of-Way (R/W) requires a Caltrans-issued encroachment permit.

For information regarding the Encroachment Permit application and submittal requirements, contact:

Caltrans Office of Encroachment Permits
464 West 4th Street, Basement, MS 619
San Bernardino, CA 92401-1400
(909) 383-4526

D8.E-permits@dot.ca.gov

<https://dot.ca.gov/programs/traffic-operations/ep>

Important Note: All new permit applications must now be submitted through our new CEPS Online Portal at: <https://ceps.dot.ca.gov/>

Thank you again for including Caltrans in the review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D8@dot.ca.gov or call 909-925-7520.

Sincerely,



Janki Patel

Branch Chief - Local Development Review
Division of Transportation Planning
Caltrans District 8

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