

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 6.1

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.

- Rejected by ALUC for residential density issues.
- How do you plan to address the potential violation of the City General Plan Objective LU-22, which aims to avoid land use decisions that could impact the long-term viability of the March Air Reserve Base/Inland Port Airport (MARB/IPA)?
- What specific justifications can you provide for the City Council's proposed decision to overrule the ALUC's action, particularly in light of the residential density issues that led to the rejection?
- Can you provide a detailed analysis of how the proposed project will not affect the orderly expansion of MARB/IPA, despite the ALUC's concerns about residential density?

- What measures will be taken to ensure that the proposed project complies with the procedural requirements for overruling an ALUC action, including providing the necessary documentation and allowing for agency comments?
- Have you conducted any risk assessments or consulted with aviation experts to evaluate the potential consequences of proceeding with the project despite the ALUC's rejection, and if so, what were the findings and recommendations?

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