

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