

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 1.3

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